



**Suffolk Coast and Heaths Area of Outstanding
Natural Beauty Boundary Variation Project**

Report on the 2018 Consultation

December 2018

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1.0 Introduction

1.1 Scope of Work

- 1.1.1 Natural England is currently considering whether certain areas adjacent to the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (SC&H AONB) should be designated as Area of Outstanding Natural Beauty (AONB). In September 2017 the Natural England Board approved the formal technical assessments of whether there is land in the Study Area which meets the statutory criterion for designation as AONB, whether the designation of this land is desirable for the purpose of conserving and enhancing its natural beauty and where the proposed boundary should be. The Board also approved proceeding to the consultation stage of the designation process.
- 1.1.2 Natural England is required by statute (Part IV, Section 83 of The Countryside and Rights of Way Act 2000), to consult every local authority whose area includes any part of the area to which the proposed Order is to relate prior to making an Order to designate land as AONB. The legislation also states that for AONB designation, the relevant local authorities are the principal tier of Local Authorities, namely the County, District and Borough Councils.
- 1.1.3 Natural England published its proposals and started the consultation process on 26th January 2018. The consultation ran for three months, closing on 20 April 2018.

1.2 Format of the Report

- 1.2.1 The remainder of the report is laid out as follows:
- **Section Two** outlines the consultation method.
 - **Section Three** contains an overall summary of the results.
 - **Section Four** contains the detailed Consultation Analysis Tables.
 - **Section Five** sets out the conclusions of the analysis.

2: Method

2.1 Informal Consultation

- 2.1.1 Once the evaluation process was sufficiently advanced to produce an initial draft proposed boundary variation, an informal consultation process was carried out from June to September 2016. The informal consultation sought to test the findings of the initial evaluation process and boundary setting process and to seek additional evidence, to inform the further development of the proposals.
- 2.1.2 Details of the initial proposed boundary extensions were provided to a range of local stakeholders. These included the statutory consultees as described above, members of the AONB Partnership and affected Parish Councils.
- 2.1.3 In addition, a range of informal consultation events were held in different locations. Separate consultation meetings were held for representatives of affected Parish Councils and members of the Suffolk Coast & Heaths (SC&H) AONB Partnership in late July 2016. At these meetings Natural England staff provided maps of the proposed variations to the boundary of the AONB, explained the criteria for designation and steps that Natural England is required to follow.

- 2.1.4 Officer-level responses were received from several statutory consultees including Suffolk County Council, Tendring District Council and Babergh District Council and Ipswich Borough Council. Responses were also received from Mistley, Bentley and Tattingstone Parish Councils as well as Manningtree Town Council.
- 2.1.5 A range of responses were received from other stakeholders, including from several landowners and the CLA. All responses were reviewed (including in the field) and as a result of these representations, several small amendments were made to the proposed boundaries of the three proposed extensions, to both remove several areas and include additional areas. The revised technical assessments and maps formed the basis of the three proposed extensions approved by the Natural England Board in September 2017.

2.2 Statutory Consultation

- 2.2.1 As stated above, the relevant statute requires Natural England to consult principal local authorities affected by the proposals. These include those with land in the proposed extensions as well as those with land in the existing AONB. Seven local authorities are statutory consultees in relation to the proposed boundary extensions. These are: Suffolk and Essex County Councils, Tendring District Council, Babergh and Mid-Suffolk District Council, Ipswich Borough Council, Suffolk Coastal District Council and Waveney District Council. The objective of the statutory consultation was to seek opinions and evidence about the proposed extensions to the SC&H AONB from the seven statutory consultees.
- 2.2.2 The statutory consultation ran for a period of twelve weeks, from January to April 2018. Letters were sent to each statutory local authority seeking formal organisational responses to the consultation. In addition, a meeting for members of statutory local authorities was held at which a briefing was given to those who attended and large-scale maps of the proposed extensions were available.

2.3 Public Consultation

- 2.3.1 Cabinet Office Guidance on Community Engagement recommends that communities and groups which may be affected by policies and projects should also be consulted. In line with national good practice, it was thus decided to extend the statutory consultation to include a wide range of local stakeholders including Parish Councils, local landowners and businesses and the wider public. In recognition of the national status of AONB designation, relevant national organisations were also consulted.
- 2.3.2 In line with the Equality Impact Assessment which was carried out, the wider consultation sought the views of a wide range of other stakeholders, including the communities of interest and place who live, work, visit, or otherwise have an interest in or near the areas under consideration. In doing so an engagement process was developed which aimed to ensure people had an opportunity to discuss issues with relevant Natural England staff and have access to information which was simple to understand and be as inclusive as possible, including for hard to reach groups.
- 2.3.3 A range of methods was used in order to encourage as wide a response as possible and a range of events were held. Meetings were held for members of the AONB Partnership, Parish Councils, and representatives of local amenity and recreation groups. A separate meeting was held for landowners and farmers at the request of the CLA. These meetings followed the same format as the local authority meeting outlined above. In addition, two all day 'drop in' events were held for members of the

public and provided an opportunity for local people to discuss the proposals on a one to one basis with Natural England officers. Maps of the proposed extensions and copies of the technical assessments were made available for information at all the meetings.

2.4 Consultation Method

2.4.1 A range of background information was made available. These included

- a factsheet
- A plain English Consultation Document outlining the project and designation process
- A set of maps showing the proposed extensions.

2.4.2 In addition, a range of more detailed information was made available for those requiring more technical information. This included the following documents:

- The Natural England Guidance for assessing landscapes for designation as National Park or AONB in England (hereafter referred to as the Guidance)
- The Natural Beauty Assessment
- The Desirability assessment
- The Boundary Considerations

2.4.3 A questionnaire was devised to elicit structured responses about the different stages of the technical assessment and evaluation process as well as about the proposed boundaries for each of the three proposed extensions. The questionnaire included both open and closed questions in order to obtain simple quantitative data and more detailed supporting evidence that we could take into consideration. For each of the three proposed extensions the following questions were posed:

- Does this area have sufficient natural beauty to be designated as AONB?
- Is it desirable to designate this area as AONB due to its natural beauty?
- Is the proposed boundary appropriate?

2.4.4 The questionnaire also requested respondents to provide basic information about themselves to obtain an understanding of their location and whether they were representing an organisation. It also enabled diversity monitoring. Space was also provided for respondents to supply any additional information that they felt to be relevant.

2.4.5 Consultees were given the opportunity to submit questionnaire responses either on-line, or by completing and returning a printed questionnaire. Responses by letter or email were also accepted. The on-line questionnaire was hosted on Defra's 'Citizen-Space' consultation portal and on-line responses were encouraged.

2.4.6 In recognition of accessibility issues, the documents listed above were however also made available as printed documents on request. Copies of the full range of documents were also placed in local libraries and made available at the meetings. In addition, all meetings were held in fully accessible locations.

2.4.7 Statutory and other consultees were informed of the consultation by letter. A comprehensive database was set up to manage the consultation process and include details of the statutory local authority consultees; Parish Councils; SC&H AONB Partnership members (such as the CLA, NFU and RSPB); local businesses, amenity and recreation groups and community organisations. A range of other national

organisations such as the National Association of AONBs as well as MPs with constituencies with land in or adjacent to the existing AONB and/ or the proposed extensions were also consulted by letter.

- 2.4.8 A communications plan was produced and the consultation was promoted through a wide range of media. A press release resulted in local coverage in newspapers and on TV. In addition to the initial consultation letter, follow up emails were also sent to all consultees on the database shortly before the deadline for responses.

3.0 Results

3.1 Summary

- 3.1.1 One hundred and twenty-six consultation responses were received, of which the great majority (75%) was by use of the on-line Citizen Space questionnaire. Eighteen paper copies of the questionnaire (14%) were returned and thirteen letter responses (10%) were received, totalling 25% of responses. Those responses received on paper copies of the questionnaire, or by letter, were transcribed into Citizen Space by Natural England staff. All responses were allocated to individual themes to facilitate the analysis contained in the tables in the sections below.

4.0 Detailed Consultation Analysis Tables

4.1 Analysis of comments on the consultation method

- 4.1.1 Several respondents supplied comments relating to the consultation process and method. Generic comments are considered below in Table One. Where comments on method relate to individual extensions, specific parts of the technical assessments, evaluation or boundary setting process, these have been included at the top of the relevant Analysis Table further below. For example comments in relation to the selection of the Study Area for evaluation made by an objector to the proposed Samford Valley Extension, are considered in Section 4.4 Analysis of Qualitative responses relating to the Natural Beauty of the Proposed Samford Valley Extension. Comments in relation to the consultation exercise as a whole are considered in the table below.
- 4.1.2 Throughout the analysis tables, responses from statutory consultees, companies or other organisations have been attributed to them, the remainder are anonymised. A Natural England commentary is provided for each theme raised.

Table One Analysis of comments on the Consultation Method

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
<p>Consultation approach and method</p>	<p><u>Supporting designation</u></p> <p>ANON-TK46-6MMH-1: Thanks for the opportunity to respond to this consultation. The format has been relatively easy to follow and I appreciated the option of saving and returning some time later.</p> <p><u>Objecting to Designation</u></p> <p>ANON-TK46-6M9W-V: The impression that was made fairly clear to all those that attended the public meetings was that whatever we thought or said was irrelevant and this extension was going to be implemented regardless of our views. I would urge caution in this approach as a lot of the good done through environmental schemes will, I suspect, swiftly decline.</p> <p>ANON-TK46-6MBT-2: This Body are not consulting in a fair way to peoples way of life and thinking i understand that some place in the uk are unique and are in need of preservation but to use the words aonb (sic) in a place that is clearly man made is wrong, unjustified and unfair. It is not fair that somebody who has never heard of land has the right to comment and sway a verdict when they don't have to live with the consequences and actions of what may come in the following years.</p> <p>ANON-TK46-6MDS-3, (CLA): A number of CLA members, who together own and manage a third of the total land included in the proposed Stour Estuary Extension area and the significant majority of the farmed land, do not agree that the area meets the natural beauty criteria and therefore do not believe the designation process should be taken any further. As the individuals who will be most greatly impacted by the designation, their views should be given significant weighting.</p> <p><u>Other</u></p> <p>BHLF-TK46-6MMR-B: With an aging population we are not always able to respond to consultations such as this one so our voice is never heard.</p>	<p><u>Commentary</u></p> <p>ANON-TK46-6MMH-1: Natural England welcomes the support for the consultation process of this respondent. The CRoW Act only requires NE to consult the statutory local authorities. To the extent that we consulted with people and organisations other than the statutory consultees, those consultations were discretionary public consultations which were undertaken to inform Natural England’s internal consideration of the issues prior to making the Order.</p> <p>The formal consultation was run using ‘Citizen Space’, an on-line consultation platform used by many government departments. We also accepted responses by letter and email and on a printed version of the consultation which we transcribed into Citizen Space. We received no negative feedback about the consultation method itself (such as the use of Citizen Space).</p> <p>ANON-TK46-6M9W-V: We supported both consultations with meetings with specific groups and ‘drop-ins’ for the public. During all these meetings and in our published information we made it clear that we want to hear as many opinions as possible and ideally supported by evidence in order to ensure that the correct decision was made.</p> <p>ANON-TK46-6MBT-2: It is difficult to understand how the impression could have been reached that we had not run the consultation in a ‘fair way’. We not only extended the consultation to include anyone with an interest in the proposed boundary revision but also ran an earlier ‘informal’ consultation following which we made some amendments to the proposals.</p> <p>We also emphasised that any variation to the boundary would only take effect if confirmed by the Secretary of State who could call a Public Inquiry if minded to do so. Natural England’s responsibilities with regard to the designation of AONBs are set out in the legislation and therefore Natural England would be open to challenge if we attempted to implement a boundary change or a new designation unless in complete compliance with the CRoW Act.</p> <p>The Natural England staff directly involved in considering this designation have very considerable experience in such matters including with regard to other landscape designations subsequently confirmed by the Sec of State.</p>

	<p>ANON-TK46-6MMY-J: Other people's view should be taken into consideration</p>	<p>BHLF-TK46-6MMR-B: Of the 110 respondents who indicated which age bracket they are in, all but 12 are over 45 and 47% (52 respondents) are in the 65+ age group. This indicates that age is unlikely to have been a significant constraint to the consultation and that the voice of older people is in fact being taken account of.</p> <p>It should be noted that Natural England considerably exceeded the consultation requirements as set out in the CRoW Act. The purpose of doing so was to help inform its own decision making. It is also hoped that a further outcome will be increased understanding of the designation process. An informal consultation exercise was carried out at a time when the proposals were still at a formative stage. This helped inform Natural England's decision-making during the development of the proposals.</p> <p>ANON-TK46-6MDS-3 CLA: With regard to the 'weighting' that is given to any particular consultation response, Natural England's responsibilities under the legislation must be entirely governed by reference to the actual words of the relevant statutory provision which with regard to the desirability of designation states:</p> <p style="padding-left: 40px;">"Where it appears to Natural England that an area which is in England but not in a National Park is of such outstanding natural beauty that it is desirable that the provisions of this Part relating to areas designated under this section should apply to it, Natural England may, for the purpose of conserving and enhancing the natural beauty of the area, by order designate the area for the purposes of this Part as an area of outstanding natural beauty" {S81(1) Countryside and Rights of Way Act 2000}</p> <p>The legislation does not therefore enable Natural England to give greater weight to responses received from CLA members or other land managers and farmers.</p> <p><u>Conclusion:</u> Natural England does not accept that it has been 'unfair' in its approach to the consultation. The approach to consultation considerably exceeded the requirements set out in the CRoW Act. Natural England opened the consultation to a wide range of organisations and the wider public. The consultation was widely promoted both in the media and through a series of open meetings and drop in events. In addition Natural England undertook an additional informal consultation exercise at a time when the proposals were still at a formative stage. Responses to this informed Natural England's decision-making during the development of the proposals.</p>
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4.2 Quantitative Analysis

4.2.1 Responses from Statutory Consultees

4.2.1.1 Five out of a total of seven statutory consultees responded to the consultation. Detailed responses were received from all four statutory consultees with land within the three proposed extensions (Essex and Suffolk County Councils and Tendring and Babergh District Councils) as well as from Ipswich Borough Council, which has land within the existing SC&H AONB. All five agreed with the principle of designation of the proposed extensions, but all requested the inclusion of differing areas of additional land within the boundaries. Neither Suffolk Coastal nor Waveney District Councils, (both of which are statutory consultees with land in the existing AONB but not within the proposed extensions), responded to the consultation.

4.2.2 Responses from the AONB Partnerships.

4.2.2.1 Detailed responses were received from both the SC&H AONB and the Dedham Vale AONB Partnerships. Both were in favour of designation of the areas within the proposed boundaries but requested the inclusion of additional land within the boundaries.

4.2.3 Responses from Parish Councils.

4.2.3.1 Responses were received from nine Parish Councils. These are shown in Table Two below. None of the Parish Councils who responded objected to the designation of the proposed extensions, although one Parish Council with land in the proposed extension (Bradfield Parish Council) and two who do not have land in the proposed extension (Harkstead and Woolverstone) requested the inclusion of additional areas.

4.2.4 Amenity Bodies

4.2.4.1 Other amenity bodies: Responses were received from a number of amenity and environmental organisations such as the Stour & Orwell Society, the Harwich Society, the Stour Sailing Club, Suffolk Preservation Society and Suffolk Wildlife Trust. All expressed general support for the proposed designations and several proposed alternative boundaries.

4.2.5 Landowners/ farmers and their representatives:

4.2.5.1 A total of seven respondents identified themselves as either landowners / farmers and responses were also received from a land agent, representing one of the landowning families and the CLA, representing the landowners/ farmers who were also their members. Five of the landowners / farmers were from two families, one farming a significant area of the proposed Samford Valley extension and the other, land on the southern shore of the Stour Estuary around Ragmarsh Farm. Six of the seven landowners responded using Citizen Space to state their opinion that specific areas had insufficient natural beauty and/or that it was not desirable to designate either all or part of their own landholding or a wider area within parts of the proposed Stour Estuary and Samford Valley extensions. One landowner supported the extensions. No respondents identified themselves as landowners/ farmers within the Freston Brook proposed extension.

4.2.6 Business interests:

4.2.6.1 Few respondents identified themselves as representing non-farming or other business interests and only one who did, objected. Hopkins Homes, a housing

developer, agreed with the principle of designating the Stour Estuary but objected to Natural England's proposed boundary, suggesting that a large area of the proposed Stour Estuary extension between New Mistley and Bradfield and adjacent to a current housing development be removed from the proposed boundary variation.

4.2.7 Members of the public:

4.2.7.1 A significant majority of responses from members of the public were in favour of all three of the proposed extensions, with the proposed Stour Estuary extension receiving the largest number of positive responses and the Freston Brook extension the fewest.

Table Two: Responses from Parish Councils

Parish Council	Stour Estuary Extension				Samford Valley Extension				Freston Brook Extension			
	General Response	Natural Beauty	Desirability	Boundary	General Response	Natural Beauty	Desirability	Boundary	General Response	Natural Beauty	Desirability	Boundary
Brantham	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree
Bradfield	Agree	Agree	Agree	Include additional area at Mistley High Street	-	-	-	-	-	-	-	-
Freston	Agree	-	-	-	Agree	-	-	-	Agree	Agree	Agree	Agree
Harkstead	Agree	Agree	Agree	Include additional area so boundary abuts Dedham AONB	Agree	Agree	Agree	Include additional area so boundary abuts Dedham AONB	Agree	Agree	Agree	Agree
Kettleborough	Agree	Agree	Agree	Not sure	Agree	Agree	Agree	Not sure	Agree	Agree	Agree	Not sure
Shotley	Agree	Agree	Agree	Agree	-	-	-	-	-	-	-	-
Stutton	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree
Tattingstone	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree
Woolverstone	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Include whole of Shotley Peninsula	Agree	Agree	Agree	Include whole of Shotley Peninsula

4.2.4 Overall Responses

Table Three: Overall Responses Summary

The following table shows the headline figures for the questions in the consultation questionnaire for each of the three proposed extensions.

Proposed Stour estuary extension Percentage of Responses and (Number)					
	Yes	No	I don't feel able to comment / not sure	Not Answered	Total No. of responses
Do you agree with this proposed extension to the Suffolk Coast and Heaths AONB?	89% (101)	5% (6)	5% (6)	0% (0)	113
Does this area have sufficient natural beauty to be designated as AONB?	89% (101)	4% (5)	4% (4)	3% (3)	113
Is it desirable to designate this area as AONB due to its natural beauty?	89% (101)	4% (5)	4% (4)	3% (3)	113
Is the proposed boundary appropriate?	64% (72)	4% (5)	15% (17)	17% (19)	113
I wish to suggest an alternative boundary	13	n/a	n/a	n/a	13
Proposed Samford Valley Extension					
	Yes	No	I don't feel able to comment / not sure	Not Answered	Total

Do you agree with this proposed extension to the Suffolk Coast and Heaths AONB?	63% (71)	5% (6)	23% (26)	9% (10)	113
Does this area have sufficient natural beauty to be designated as AONB?	58% (66)	4% (5)	17% (19)	20% (23)	113
Is it desirable to designate this area as AONB due to its natural beauty?	58% (65)	4% (5)	14% (16)	24% (27)	113
Is the proposed boundary appropriate?	48% (54)	4% (4)	19% (21)	30% (34)	113
I wish to suggest an alternative boundary	4	n/a	n/a	n/a	4
Proposed Freston Brook Extension					
	Yes, I agree	No, I disagree	I don't feel able to comment / not sure	Not Answered	Total
Do you agree with this proposed extension to the Suffolk Coast and Heaths AONB?	64% (72)	2% (1)	25% (28)	11% (12)	113
Does this area have sufficient natural beauty to be designated as AONB?	64% (72)	2% (2)	0% (0)	34% (39)	113

Is it desirable to designate this area as AONB due to its natural beauty?	58% (65)	1% (1)	0% (0)	42% (47)	113
Do you agree with the proposed boundary of this extension?	58% (65)	1% (1)	0 % (0)	42% (47)	113
I wish to suggest an alternative boundary	(0)	n/a	n/a	n/a	0

- 4.2.5 Care is needed in interpreting the bald headline figures in the tables above. It should be noted that the figures in the 'Total Number of Responses' columns contain the number of responses which responded using the questionnaire. However, thirteen responses were received in letter or email form and thus did not answer the specific questions in the questionnaire. These thirteen responses are thus not reflected in the table above.
- 4.2.7 Of these thirteen letter responses, eleven were generally in favour of designation, one response (from the RSPB) did not express a view and one from a housing developer was in favour of designating the Stour estuary, but wished to see parts of the Stour Estuary Extension removed. The eleven responses in favour of designation included those from the five statutory consultees and the two AONB Partnerships as well as four other responses, two of which were from organisations in favour of designation and two from individuals in favour of designation of the Stour Estuary Extension but who did not comment on other extensions.
- 4.2.8 As well as the response from the developer requesting an alternative boundary to remove land from the proposed extension, all of the five statutory responses, the two AONB responses and four of the individual responses suggested alternative boundaries to parts of the proposed extensions, to include additional areas of land.
- 4.2.9 As a result, the headline percentages for general levels of support for the proposed extensions and for those requesting an amendment to the boundary to include more land in the tables above are an underestimate.
- 4.2.10 From the Summary Tables it can be seen that there is a majority of respondents in favour of each of the three proposed extensions. If the eleven responses indicating general support for designation were included within the figures there is a significant majority of respondents in favour of designation of each of the three proposed designations.
- 4.2.9 The analysis of the responses to the qualitative questions is included in the following sections.

4.3 Analysis of Qualitative Responses re. Natural Beauty of the Proposed Stour Estuary Extension

C1: Does this area have sufficient natural beauty to be designated as AONB?	
Yes	101
No	5
Not Sure	4

Summary of Responses

A large majority of respondents (92%) who used the response form provided for question C1 agreed that the proposed Stour Estuary Extension has sufficient natural beauty to warrant designation as AONB. Some respondents submitted their response by letter or email. It was thus not possible to include their responses in the numeric summary table as they did not actually answer question C1, so the figures shown appear lower than the actual response rates overall. The consensus in non-questionnaire responses was also that the area has

sufficient natural beauty to be designated as AONB, with only one additional objection to this proposed extension (from a developer) received in these formats.

Four of the seven statutory consultees indicated their general support for the designation of the proposed extensions including the proposed Stour Estuary Extension, as shown in the table below. They did not make any detailed comments on the technical assessment of natural beauty for this area. Requests were made for the inclusion of some additional areas to the Stour Estuary Extension. Since these requests relate to areas outside the current boundary they are considered in Section 4.11, the Boundary Consideration Analysis table for the Proposed Stour Estuary Extension.

The SC&H and Dedham Vale AONB Partnerships also welcomed the proposals to extend the current boundary of the AONB and indicated their support for the designation of the areas included within the proposals but without offering any detailed comments on their natural beauty. They also requested the inclusion of additional areas and these are considered in the Boundary Consideration Analysis table for the Proposed Stour Estuary Extension.

The six respondents who objected included three landowners directly affected by the proposal (all from the same farming business, BI and JE Mitchell and Sons), the CLA, which reflected the views of its objecting members within the proposed extension, a developer who objected to the inclusion of land adjacent to their current development and a member of the public who had ticked the box to say the area did not have sufficient natural beauty, though this appeared to be in error as the rest of the response was in favour of its designation.

Few respondents apart from 5 of the 6 objectors gave detailed reasons for their views in relation to the natural beauty of this area. All responses were analysed and a number of common themes emerged. Each theme is considered further in the table below with relevant text from responses extracted verbatim under the relevant theme heading. Responses from statutory consultees, companies or other organisations have been attributed to them, the remainder are anonymised. A Natural England commentary is provided for each theme raised in relation to this proposed extension, together with a concluding paragraph regarding whether the evidence submitted in relation to each theme affects our assessment of the natural beauty of the area and the case for whether or not the area warrants designation.

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
Statutory Authority and AONB Partnership Responses in relation to the Natural Beauty of the proposed Stour Estuary Extension	<p><u>Supporting designation</u></p> <p>BHLF-TK46-6M99-X: Babergh & Mid Suffolk District Council: The Council welcomes the proposal to extend the boundary of the AONB southwards towards Essex and the inclusion of areas within Babergh.</p> <p>BHLF-TK46-6MME-X: Suffolk County Council: Suffolk County Council welcomes Natural England’s proposals to extend the boundaries of the SC&H AONB... The extension of the AONB is a once in a generation opportunity to ensure that the Suffolk Coast & Heaths includes all those areas that are worthy of designation.</p> <p>BHLF-TK46-6MDN-X: Ipswich Borough Council: The Council broadly supports proposals to extend the AONB into the candidate areas and thereby to support the conservation of the area’s natural beauty.</p> <p>BHLF-TK46-6MMP-9: Essex County Council strongly supports Natural England’s (NE) proposal to extend the boundaries of the SCH AONB in the areas outlined in the consultation.</p> <p>BHLF-TK46-6M9D-9: Suffolk Coast and Heaths AONB Partnership: In summary the Suffolk Coast and Heaths AONB Partnership response is:</p> <ul style="list-style-type: none"> • To welcome the proposals to extend the current boundary of the AONB. <p>BHLF-TK46-6M92-Q: The Dedham Vale AONB and Stour Valley Partnership: The Dedham Vale AONB and Stour Valley Partnership Response is to welcome the proposals to extend the current boundary of the AONB.</p>	<p><u>Commentary</u></p> <p>Four of the seven statutory consultees and the SC&H and Dedham Vale AONB Partnerships responded positively at a generic level to the proposals to extend the boundary of the AONB, including along the Stour Estuary. These general statements of support for the principle of their designation can be taken to demonstrate implicit agreement that the areas have sufficient natural beauty to warrant designation by the fact that they support the proposals, though they do not specifically state this. Although Tendring District Council did submit a response, it did not comment on whether it supported the proposals or not; confining its remarks to specific parts of the boundary. As a result its response appears solely in the boundary considerations table for the Stour Estuary Extension.</p> <p>Neither the statutory consultees nor the AONB Partnerships provided detailed comments on the natural beauty of the areas within the proposed extensions, confining their detailed comments to the additional areas which they wished to see included. Their comments on the additional areas they wish to see included are considered separately in the Boundary Considerations tables.</p>
Comments on Method of Assessing Natural Beauty	<p><u>Supporting Method</u></p> <p>ANON-TK46-6MB6-4: I think you have completed some fantastic work to propose the extension of the AONB.</p> <p><u>Objecting to Method</u></p> <p>BHLF-TK46-6MMN-7: It is quite obvious that the farming lobby has again triumphed in thwarting attempts to protect our countryside, since the criteria used to establish the AONB on the north side of the Stour are far more expansive than the present ones for the south bank. If the present criteria were now applied to the north bank half of it would disappear.</p>	<p><u>Commentary</u></p> <p>The existing Suffolk Coast and Heaths AONB was designated in 1970 and the way that areas are selected for landscape designation has changed considerably since then as a result of subsequent landscape designation projects which were the subject of public inquiries or court cases, as well as due to relevant legislative changes in both the Countryside and Rights of Way Act 2000 and the Natural Environment and Rural Communities Act 2006. The approach used is also now much more inclusive and transparent, with all technical assessments in the public domain and the consultation process opened up from just the statutory consultees to include all local stakeholders and the wider public.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
		<p>Natural England produced, consulted on, and adopted Guidance for Assessing Landscapes for Designation as National Park or Area of Outstanding Natural Beauty in England in March 2011 which reflected these subsequent developments. This Guidance was tested and found sound both during the 2013 Public Inquiry into the Lake District and Yorkshire Dales National Park extensions and also in the subsequent letters and Orders confirming both extensions by the Secretary of State in 2016.</p> <p><u>Conclusion</u> All the areas within the proposed extensions were evaluated against the current adopted Guidance. The evaluation approach used by the project team was quality assured by Natural England's Chief Scientist just prior to the September 2017 Board meeting which approved the public consultation stage. The assurance process tested the use of our guidance, precedent, published evidence and field evidence which were used as a basis for the recommendation to Natural England's Board on the proposed changes to SC&H AONB boundary. Natural England remains of the view that the methods used was robust, transparent and consistent with precedent set during recent designation projects.</p>
Landscape and scenic quality	<p><u>Supporting designation</u> ANON-TK46-6M55-P: Absolutely. It is an area of rich and varied natural beauty...This high-quality landscape includes important estuaries with mudflats and saltmarsh, tranquil ancient woodlands, cliffs, small stream valleys, and an important cultural heritage in well-managed farmland... Its scenic quality is demonstrated with a variety of stunning views of landscape and open sky along its route.</p> <p>BHLF-TK46-6MZR-R: tidal mud flats with pasture land on southern side of the Estuary. Covers the small tributaries of the Stour and nature reserves essentially a tranquil area.</p> <p>ANON-TK46-6MD2-2: The estuary and its shores are arguably the most beautiful natural feature in Essex and perhaps too in Suffolk. The relatively steep and hilly well-wooded shores are unique for the area and fjord-like. As someone who used to commute regularly by train along the southern shore, I know how beautiful this area is and also how it can impress foreign visitors coming off a ferry.</p>	<p><u>Commentary</u> A large number of respondents made generic comments relating to why they thought the Stour Estuary extension area overall has sufficient landscape and scenic quality to warrant designation as AONB. These generally focussed on the qualities and character of the estuary, and the contribution made to its natural beauty by its slopes and tributary valleys, the woods, cliffs, pastures and arable crops. In addition the visual contrasts in land use between these features and the high scenic qualities and extensive views to and from the area were commented on by a large number of respondents. These comments are in line with Natural England's technical assessments.</p> <p>ANON-TK46-6MB2-Z , ANON-TK46-6MB7-5, ANON-TK46-6MBT-2: Three objecting respondents from the same farm business stated that the landscape of the area between Bradfield and Wrabness Nature Reserve, including Ragmarsh Farm is entirely man-made, with no natural features, though one did accept that it was beautiful and further commented on the "patch work quilt of different designs and colours of crop". The NERC Act 2006 clarified that land used for agriculture or woodlands, used as a park, or an area whose flora, fauna or physiographical features are partly the produce of human intervention in the landscape can still have natural beauty and may be included in landscape designations.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>ANON-TK46-6MDM-W: The Essex side of the estuary contains important landscape features including wooded areas coming down to the seashore.</p> <p>ANON-TK46-6M9Z-Y: Quiet farmland and woods bordering beautiful river and hosting wonderful wildlife.</p> <p>ANON-TK46-6M9T-S: The southern shore is heavily wooded and with areas of farmland as well as the nature reserves at Copperas Bay and Copperas Wood and also at the Wrabness nature reserve on the old Mine Depot site.</p> <p>ANON-TK46-6MDW-7: Undoubtedly this area does have sufficient natural beauty to be designated an AONB and, perhaps of equal importance, it is an area that can be viewed freely by everyone who so wishes</p> <p>ANON-TK46-6M98-W: The combination of river, wildlife and scenery are amongst the best in the country and indeed much of the world. It is clearly outstanding and beautiful due to it's natural and unspoilt appearance.</p> <p>ANON-TK46-6MBY-7: The Stour and Orwell believes that this area does have sufficient natural beauty to be designated as an AONB. We believe that it meets the criteria needed to be designated focusing on Landscape Quality Scenic Quality</p> <p>ANON-TK46-6MM3-C: The Stour Valley is a beautiful area of countryside and a great asset to the people of Suffolk and to visitors to the County... You only have to walk along one of the many paths along the river to see how beautiful it is.</p> <p>ANON-TK46-6M9J-F: We support the proposed extensions to the Suffolk Coast and Heaths AONB, the area is of high environmental value and we are therefore pleased to see the designation being extended to recognise this.</p> <p>ANON-TK46-6M57-R: The same reasons as you have proposed the extension.</p> <p>ANON-TK46-6M5T-N: It is a rural, coastal area and a haven for birds</p>	<p>Natural England agrees with the objector who noted that this area is a 'patchwork quilt of different designs and colours of crop' and considers that this pattern of arable crops makes a positive contribution to the natural beauty of the wider area of estuary slopes. The Natural Beauty Assessment of Area S5, Central Estuary and Southern Slopes (which contains the area around Ragmarsh Farm) noted that much of the stretch of estuary slopes between Bradfield and Wrabness Nature Reserve had been subject to significant landscape change including loss of boundary features, habitats and trees and a change to intensive agricultural production and that this change had significantly fragmented the natural beauty of the area in places, affecting landscape and scenic quality to a degree. However it also noted that the area contains several tributary valleys running down to the estuary with associated areas of woodland and these features combine with the neighbouring gentle, farmed valley slopes, contributing to a higher level of natural beauty overall and when compared with the surrounding flat plateau areas.</p> <p>The technical assessment further noted that the removal of trees and hedges had opened up sweeping, expansive and highly scenic views, particularly from the higher ground in this area towards the estuary itself and the northern estuary slopes within the existing AONB. The assessment also noted that this area as a whole has a strong visual unity, where the interplay of the gentle farmed and wooded slopes, the flat textured saltmarsh, mudflats and open water of the estuary and undulations created by the tributary stream valleys combine to produce attractive landscape compositions.</p> <p>This stretch of land is considered to be an important component of the uninterrupted stretch of undeveloped estuary slopes running all the way from Mistley to Parkeston. These slopes frame the estuary when viewed from both the estuary itself and also from the northern slopes of the estuary. The area has a very strong connection to the estuary landscape and sits well within the zone of visual influence of the estuary slopes.</p> <p><u>Conclusion</u> Natural England agrees with the many respondents who commented that the proposed Stour Estuary Extension as a whole has sufficient natural beauty to warrant designation. Whilst it is also agreed that the landscape and scenic qualities of the Ragmarsh Farm area are affected by intensive agriculture to a degree, the presence of other features contributing to natural beauty in</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>BHLF-TK46-6MZW-W: God's own country.</p> <p>ANON-TK46-6MZH-E: It is such a beautiful and unspoilt area I assumed it was already designated!!</p> <p>ANON-TK46-6MDC-K: Ancient tidal estuary important for migratory birds. Important beauty spot as evidenced by visitors.</p> <p>ANON-TK46-6MDT-4: As an employer in a City of London financial business looking to attract employees to the area, it seems critical that the features that make coastal Suffolk attractive are preserved on sufficient scale to have a meaningful impact for the region as a whole. The proposed expansion would help to achieve that by including areas that unambiguously deserve such protection.</p> <p>BHLF-TK46-6MDX-8: They offer some lovely rolling roads and matching scenery.</p> <p>ANON-TK46-6M9U-T: The southern slopes of the Stour estuary are noted for their natural beauty.</p> <p>ANON-TK46-6M9A-6: The Stour and Orwell estuaries, their shorelines and the Shotley Peninsula are a 'jewel in the crown of Suffolk landscapes.</p> <p>ANON-TK46-6M9X-W: As a family we sail regularly on the Stour both the north and south banks contribute to the overall natural beauty of the area.</p> <p>ANON-TK46-6MBW-5: Dark skies at night, spectacular scenery, natural beauty and wildlife by day on land and water.</p> <p>ANON-TK46-6MB5-3: Just walking there explains all.</p> <p>ANON-TK46-6MBM-U: I have lived in Mistley for 18 years and sailed on the Stour Estuary for much of that time. I continue to find the countryside, wildlife and quality of the historic built fabric in this area astounding.</p>	<p>these areas and the important role both areas play in the zone of visual influence of the estuary as a whole, are considered to outweigh the impact of the intensive farming on parts of the estuary slopes. Natural England continues to hold the view expressed in the technical assessment that the area between New Mistley and Bradfield should be included and that whilst the inclusion of the area around Ragmarsh Farm is a finely balanced decision, on balance its inclusion is warranted.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>ANON-TK46-6MB9-7: The area is of great natural beauty and needs to be fully protected</p> <p>ANON-TK46-6MMU-E: The Stour valley is a beautiful area and the more of it that is protected the better.</p> <p>ANON-TK46-6MKV-D: It is stunning and deserves to be incorporated.</p> <p>ANON-TK46-6MK6-D: When approached by sea, this is one of the most beautiful estuaries around... view across the estuary from one side to the other are also extremely attractive</p> <p>ANON-TK46-6MKN-5: The stour estuary (sic) is an extremely beautiful stretch of water attracting an abundance of natural wildlife along with tourists that visit to take in the natural surroundings.</p> <p>ANON-TK46-6M54-N: The views along the river on the south side of Felixstowe, Shotley, the Royal Hospital School and Brantham Church together with the walk along Wrabness beach, the Mistley Towers and the swans along the Walls into Manningtree are exhilarating.</p> <p>ANON-TK46-6M5X-S: The views are wonderful and are home to wildlife and gives access to physical activities (sic).</p> <p>ANON-TK46-6MMH-1: The wider span of the Stour valley across its estuary contrasts with and complements the narrower spans of the Orwell, Deben and Alde/Ore. In fact, collectively all four features form an interesting landform sequence of post-glacial drowned valleys, diminishing in size and extent from south-west to north-east.</p> <p>ANON-TK46-6MMY-J: This is one of the best views of the area and should be preserved.</p> <p>ANON-TK46-6M56-Q: Peaceful wide views.</p> <p>BHLF-TK46-6MMW-G: The broader estuary views across the Stour are very much part of the East Anglian coastal scene and it is easy, if not easier, to imagine Anglo Saxon invaders sailing up the Stour as it is the Deben.</p>	

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>ANON-TK46-6MKK-2: The views are uninterrupted and stunning at all times of the year</p> <p>ANON-TK46-6M5R-K: This area offers seclusion and protection to wildlife and offers the visitor delightful views and opportunities to enjoy natural habitats and landscape without commercialisation or overcrowding.</p> <p>ANON-TK46-6M5A-2: beautiful views across the estuary and some lovely ancient woodland.</p> <p>BHLF-TK46-6MZB-8: Beautiful views</p> <p>BHLF-TK46-6MZM-K: I have spent many years walking in these areas and it seems essential to me to protect the beautiful views right across the Stour.</p> <p>ANON-TK46-6MZZ-Z: In my opinion this area proposed as a new AONB does indeed qualify as such because of the beautiful long reaching views containing different habitats for bird and wildlife and agriculture, plus much needed open green space for healthy living.</p> <p>ANON-TK46-6M93-R: Much of the south side of the Stour Valley is as naturally beautiful as the north and even more so in places...Obviously the view from the current North Side AONB is enhanced by the view to the South and vice versa.</p> <p>ANON-TK46-6MBV-4: Its obvious, good scenery.</p> <p>BHLF-TK46-6MDE-N: The intertidal mud flats and the littoral countryside - woodlands, small agricultural fields, scattered domestic buildings.</p> <p><u>Objecting to designation</u></p> <p>ANON-TK46-6MB2-Z: The part where Ragmarsh farm is situated is a busy working farm who's landscape was man made for modern farming technics (sic).</p> <p>ANON-TK46-6MB7-5: All of the Area in Bradfield north of Harwich rd is man made with all trees, hedges and ditches removed for modern economical food production... Ragmarsh Farm is a man made undulating open intensive</p>	

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>modern farm with no trees ,hedges, ditches or wildlife with tractors and machinery working in all seasons and at any time of the day including potatoes creating noise and activity all year.</p> <p>ANON-TK46-6MBT-2: Ragmarsh Farm is a manmade landscape with all natural assets such as trees , hedges, ditches removed for modern farming purposes . The only thing that is natural in this landscape is the river bed and the tide that comes in and out the rest of it is controlled by man....You should include that the farmed land in this zone is in a lot of cases grade 1 arable farm land that is intensively farmed and cropped it is not in a natural habitat such as forests, dales moors, vales, bogs or heathland all these examples are natural and are rarely changed in there (sic) own unique appearance all our land at Ragmarsh Farm has been drained to let water escape it is farmed differently with crop rotation so i cannot see how it is natural, yes its beautiful but its man made... Ragmarsh farm is a modern intensive farm cropping potatoes, onions, wheat, soya, peas, barley, grass etc every year every field is different making up a patch work quilt of different designs and colours of crops all this is man made and not natural.</p>	
<p>Comparisons with SC&H AONB or Dedham Vale AONB</p>	<p><u>Supporting designation</u></p> <p>ANON-TK46-6M53-M: This area is similar to that already covered by the existing AONB and well worthy of inclusion</p> <p>ANON-TK46-6M96-U: The landscape has integrity as a whole, with the river and north and south banks appearing a (sic) a single landscape - as with the Orwell.</p> <p>ANON-TK46-6MZ6-V: The interglacial deposits at Wrabness are linked with those at Stutton and Harkstead on the north bank of the estuary, and together they tell the post-Anglian story, of not only the Stour, but also the Orwell and Deben Estuaries. A story of regional, possibly national importance such that the Wrabness site should be designated along with the rest of the AONB.</p> <p>ANON-TK46-6M9T-S: It is highly desirable to designate the larger part of the Stour Estuary as an AONB because this is an overall visual landscape which includes the Suffolk shore already in the AONB and should include the Essex shore. The beauty of the Estuary can be appreciated when sailing up the Estuary and this includes both shores. The southern shore is more susceptible (sic) to possible development which is already incurring at Mistley</p>	<p><u>Commentary</u></p> <p>Natural England agrees with the many respondents who suggested that the character of the proposed Stour Estuary Extension shares many features with areas in the existing AONB on the northern side of the estuary and this is reflected in the technical assessment of natural beauty for this area. The assessment also highlights how the proposed extension is, overall, of a similarly high quality to areas within the existing AONB, demonstrating the presence of many of the factors which contribute to natural beauty. In its assessment, Natural England noted the degree to which the area shares the character and qualities of the matrix of woodland, arable and pasture typical of estuary valley sides within the wider AONB, defining the Stour estuary as a single landscape unit and how it also differs from the surrounding adjacent flat plateau landscapes further inland, where landscape and scenic quality is lower. There is a strong sense of visual unity over the estuary as a whole which is also shared with other estuaries within the wider AONB.</p> <p>It was established during the South Downs Public Inquiries however that the test for inclusion of land within a National Park or AONB is not comparison with other nationally designated areas or adjacent areas, but against wider ordinary countryside. Similarity of character alone is not a valid reason for</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>and Manningtree and in the area adjacent to Parkeston Quay.</p> <p>ANON-TK46-6M55-P: It shares many of the same aspects and geography of the existing AONB area on the north shore of the river. Together they are an important landscape unit. Together they are an important whole and, with one side already protected, by definition it would seem an important area to be designated and included within the extension of the boundary in its entirety.</p> <p>BHLF-TK46-6MZX-H: The Essex side of the Stour Estuary has a natural beauty matching that of the Suffolk side -albeit somewhat different.</p> <p>ANON-TK46-6M5N-F: It is similar to that which exists in the existing AONB.</p> <p>ANON-TK46-6M5X-S: This is a beautiful area along both sides of the River Stour. It also has historical and artistic merit</p> <p>ANON-TK46-6M96-U: The landscape has integrity as a whole, with the river and north and south banks appearing a (sic) a single landscape - as with the Orwell.</p> <p>ANON-TK46-6M9N-K: The southern estuary slopes of the River Stour offer similar features to those on the northern side with varied habitats such as ancient woodland, mudflats and managed farmland. As the northern shore is already within the AONB inclusion of both the estuary and its undulating and more accessible southern shore to give panoramic views to the north would be welcomed.</p> <p>ANON-TK46-6MMH-1: It is logical and appropriate to apply the same principle to the whole of the Stour valley, from its northern to its southern plateau edges, including its estuarine component.</p> <p>BHLF-TK46-6MMW-G: It is the whole length of the estuary as seen from all points of the compass which comprise the natural beauty, not just the view from the north or south side. I think the wider estuary exhibits different panoramic views from that experienced next to the Orwell, Deben or Alde.</p> <p>BHLF-TK46-6MMM-6: To balance the ANOB (sic) on the north bank of the River Stour.</p>	<p>including or excluding land; the natural beauty criterion does not require 'characteristic' natural beauty.</p> <p>Conclusion Natural England remains of the view that the area as a whole shares its overall character and qualities with areas of land within the existing AONB, particularly on the north side of the Stour Estuary; but that it also meets the natural beauty criterion for designation in its own right, as described in the Assessment of Natural Beauty.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>ANON-TK46-6M54-N: The south bank of the River Stour is in every way equal to the north bank as an AONB</p> <p>BHLF-TK46-6MZN-M: The north bank is already so designated, and already influenced by the beauty and proximity of the river. If that premise is accepted, it seems quite illogical not to include the river itself, and at least part of the south bank</p> <p>ANON-TK46-6MM4-D: It mirrors the northern side.</p> <p>ANON-TK46-6MMD-W: South side of estuary is as beautiful as the north, in places more so. Protecting this side enhances the views from either side</p> <p>ANON-TK46-6M5H-9: Of course it does and let's face it the other side of the river has it (sufficient natural beauty).</p> <p>BHLF-TK46-6MZK-H: The Essex side of the Stour Estuary has a natural beauty matching that of the Suffolk side -albeit somewhat different</p> <p>BHLF-TK46-6MDE-N: The proposed extension will complement the present illogical boundary. The Essex side of the river is of equal quality to the Suffolk side.</p> <p>ANON-TK46-6MDM-W: Previous landscape studies carried out have clearly identified the quality of that landscape as at least equal to the existing AONB. All these studies have been given weight in Planning decisions and previous Local Plans produced for Tendring District Council.</p> <p>ANON-TK46-6M5N-F: It is similar to that which exists in the existing AONB.</p> <p>ANON-TK46-6MD9-9: Area has equal natural beauty as existing area.</p> <p>ANON-TK46-6M9T-S: The southern shore of the Stour Estuary is equally beautiful to the north shore which is already in the AONB.</p> <p>ANON-TK46-6MM4-D: the southern side of the Stour is equally important as the northern side.</p> <p><u>Objecting to designation</u> None</p>	

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
<p>Impact of incongruous features on landscape and scenic quality</p>	<p><u>Supporting designation</u> ANON-TK46-6MZH-E: It is totally quiet, unspoilt and we have fewer and fewer such places.</p> <p>BHLF-TK46-6MZN-M: I walk this area regularly, following the Essex Way to Stour Woods from Lawford on the permissive path in Copperas Woods. The area is beautiful, relatively unspoilt, and should remain that way.</p> <p>BHLF-TK46-6MZN-M: The area is beautiful, relatively unspoilt, and should remain that way.</p> <p>ANON-TK46-6M9H-D: N19A: It is the most beautiful river estuary and largely unspoilt with a large population of migratory birds.</p> <p>ANON-TK46-6M98-W: It is clearly outstanding and beautiful due to it's natural and unspoilt appearance.</p> <p>ANON-TK46-6MMY-J: The Stour Estuary is unspoilt so far but being near to Harwich and Felixstowe Docks the proposed area should be protected to avoid as much development as possible. In Shotley Gate we have the Heritage Park which provides a narrow area of woodland protecting natural foliage and birdlife.</p> <p><u>Objecting to designation</u> ANON-TK46-6MB2-Z: There is a large solar farm that can be seen from the AONB boundary line... We have land that is rented for horse paddocks, which brings us a good revenue, and this is something we see will only grow as part of our business with 1800+ houses being built in a 3 mile radius of us. Pony paddocks do not seem to be part of natural England's desires for AONB but for our business, this is essential.</p> <p>ANON-TK46-6MBT-2: (BI and Je Mitchell and sons Response) The Farm is split in the middle by a dual line railway i cannot think of anything more unnatural or man made than a diesel freight train or a electric commuter train powered by lines supported by giant galvanized shiny steel uprights running through the landscape every house and farm building is man made all of the above is definable by being man made and defies the objective of being an area of outstanding natural beauty i think people are allured by the status of the name area of outstanding natural beauty and are blinkered by what is man made .</p>	<p><u>Commentary</u> Several respondents commented on the largely unspoilt nature of the proposed extension.</p> <p>The three objecting landowners and CLA commented in more detail on the impacts of the incongruous features which occur in the area around Ragmarsh Farm. Natural England considers that the majority of the proposed extension is largely unaffected by significant incongruous features, but the Assessment of Natural Beauty did comment on the impact of a range of detracting features which do affect the area commented on by these four objectors to this proposed extension.</p> <p>For ease of reference, each detracting feature affecting the area around Ragmarsh farm is considered separately under the following sub-theme headings below: A) Railway infrastructure B) Solar Farm C) Pony paddocks D) Pig Production E) Fence at Mistley Quay and blocks at Bradfield Shore</p> <p>A) Railway Infrastructure (Embankment, unattractive gantries and electrification infrastructure) The technical assessment noted that the railway runs along the length of the southern valley slopes within the proposed extension, largely at grade or in a cutting. Where, in places it runs on an embankment it is acknowledged that it fragments the valley slopes physically and visually, cutting off views of the estuary in a few places and that the tall electrification gantries and other features affect landscape and scenic quality to a degree. However as stated in the technical assessment, the effects are felt only locally, eg from parts of the Essex Way and other rights of way in close proximity or from the estuary slopes north of the B1352 to the west of Jacques Hall. They are not significant in views from the estuary itself, or from the northern estuary slopes. Natural England considers that in relation to the proposed Stour Estuary extension as a whole, the area affected visually by the railway is relatively small. Whilst it does fragment the area in places, it does not do so to such an extent as to affect the ability of the estuary slopes as a whole to meet the criterion of natural beauty. The impact of the transport corridor on tranquillity is considered under the theme of Relative Tranquillity below.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>ANON-TK46-6MB7-5 (BI and Je Mitchell and sons Response): It is ideal for agricultural diversity and diversification such as outdoor pig production with wide open spaces such land is valuable to such a unit as its free draining soils for rain water and sizeable fields for large numbers of pig arcs. There is also already grazing to let on the Farm for Horses and Diy livery and this is something that will be expanding due to the high demand in this area with light free draining soil avoiding overwintered poaching from the horses, with grazing individual horse's comes small paddocks that are divided by electric fence tape.</p> <p>ANON-TK46-6MDS-3 (CLA Response): The railway line cutting through the middle of the proposed area to the south of the estuary, and the significant influence this line has on the Natural Beauty of the Stour Estuary, has been significantly overlooked and underestimated throughout the Natural England assessments. 58 passenger trains use the track between Harwich and Manningtree each day. This does not include non-passenger trains or freight trains moving between Manningtree, Harwich Port, Harwich Town, Harwich Refinery, or the Harwich Sidings. Train frequency may also increase in the future with reports of discussions around the installation of a significant rail maintenance depot at Parkeston... The Natural Beauty Evaluation also underestimates the impact of the embankments which can be found in a number of places along the Stour Estuary area, stating the effects are only felt locally. The embankment has a significant impact on the quality of the view down from the B1357 into the estuary, particularly around Jacques Hall. It is a particularly overbearing feature of the landscape and makes an impact over a significant distance, therefore significantly detracting from the scenic quality and relative wildness. Overall therefore, as a result of the significant impact of the railway line the natural beauty criterion is not met over most of the Central Estuary and Southern Slopes in regards to the scenic quality, tranquillity or relative wildness. Furthermore, the impact of the line is felt across the majority of the area due to how narrow the proposed area is.</p> <p>BHLF-TK46-6MZV-V: Regarding the fence at Mistley Key. Including to blocks at Bradfield shore.</p>	<p>B) Solar Farm One respondent mentions the impact of a solar farm which has been constructed in a field adjacent to the B1352, south of Lonbarn Bridge. The solar farm is not visible from most of the proposed extension. It is largely situated in a dip and on south-east-facing valley slopes associated with a tributary valley running south-westwards outside the proposed extension. It is visible from a short stretch of the B road which forms the boundary of the proposed extension in this area and a small part of it is also visible in a few places from the higher estuary slopes within the proposed extension on the north side of the B road as far as Wheatsheaf Lane, it is however, largely screened from view by the topography of the area and tall vegetation. It is not considered to significantly affect the proposed extension.</p> <p>C) Pony Paddocks The impact of areas used for keeping horses was mentioned by two of the objectors. At the time of the natural beauty assessment, the very small area used as pony paddocks near Ragmarsh Farm was not noted as having a significant impact on the natural beauty of the area within the proposed extension. Future expansion of such activities cannot be taken into consideration at this time as the legislation requires Natural England to consider current levels of natural beauty only.</p> <p>D) Pig Production At the time of the site visits, pig production was not an obvious land use in this area and was not considered to have a significant visual impact in the proposed extension.</p> <p>E) Fence at Mistley Quay and blocks on Bradfield Shore The tall metal fence which runs along the quayside at Mistley Quay was noted in the technical assessment as an unattractive feature, however it lies outside the proposed boundary (which runs along the mean high water mark along the metal sheet piling below it). The visual impact of the fencing is in any case, very localised and as it is made of wire it does not preclude views of the estuary. The blocks at the end of the lane to the estuary at Bradfield shore were placed there to prevent wider misuse of the area for boat launching. They are few in number and only affect the end of the lane. They are not considered to have a significant impact of the natural beauty of the area.</p> <p>Conclusion</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
		The presence of some incongruous features in the area was noted in the technical assessments, but Natural England remains of the view that their impact is localised and not significant. They are not considered to detract from the ability of the area as a whole to meet the natural beauty criterion.
Relative Wildness and Relative Tranquillity	<p><u>Supporting designation</u></p> <p>ANON-TK46-6MKA-R: It's relatively (sic) untouched so that has to be an advantage for the flora and Forna (sic) and wild life that feed along the banks.</p> <p>ANON-TK46-6M94-S: Landscape character relatively unchanged over the years. The wildness and unspoilt aspects of the mudflats and salt marshes should be preserved and protected to benefit wildlife for the future.</p> <p>ANON-TK46-6MBW-5: Dark skies at night</p> <p>ANON-TK46-6M9T-S: The whole of the Stour Estuary is a beautifully natural estuary which is an SSSI and RAMSR site.</p> <p>ANON-TK46-6M56-Q: It is a tranquil haven in a busy corner of the country that needs to be saved for the future generations.</p> <p>ANON-TK46-6MZH-E: It is totally quiet, unspoilt and we have fewer and fewer such places.</p> <p>BHLF-TK46-6MZR-R: Covers the small tributaries of the Stour and nature reserves essentially a tranquil area</p> <p>BHLF-TK46-6MZM-K: The peace and quiet of the whole area needs protecting</p> <p>ANON-TK46-6M9H-D: It has extensive uninterrupted views, wooded banks and is largely peaceful</p> <p>ANON-TK46-6MDF-P: Wildlife, tranquil setting</p> <p><u>Objecting to designation</u></p> <p>ANON-TK46-6MDS-3 (CLA Response): The line significantly impacts upon both the relative tranquillity and relative wildness of the area as it is a</p>	<p><u>Commentary</u></p> <p>Several respondents commented on the peacefulness, quiet and remoteness of the proposed extension, though without providing a great deal of detail.</p> <p>Three objecting landowners and the CLA commented in more detail on the impacts of features which occur in the area around Ragmarsh Farm on relative tranquillity and wildness.</p> <p>Natural England agrees with the supporters of the proposed extension that the majority of the proposed extension has relatively high levels of tranquillity notwithstanding the use of the valley slopes for arable farming in some areas. It also considers that some areas around the estuary itself have a strong sense of being away from human influence, with the estuary and its mudflats having a strong sense of relative wildness, particularly where the many large flocks of wading birds congregate.</p> <p>Four objectors commented on issues affecting relative wildness and tranquillity in the area around Ragmarsh farm. For ease of reference each issue is considered separately under the following sub-theme headings:</p> <p>A) Impact of railway on relative tranquillity B) Impact of air traffic on relative tranquillity C) Impact of agricultural noise, shooting and other noisy businesses D) Impact of traffic on the B1357</p> <p>A) Impact of railway on relative tranquillity</p> <p>The technical assessment noted the momentary noise intrusion from the trains on the Harwich Line and whilst trains are relatively frequent, at around 4 movements an hour (approximately 83 per day), they are not particularly noisy and the impact is transient. The area as a whole exhibits a significant level of relative tranquillity, enhanced by the presence of the waters and mudflats of the estuary and the natural sounds of its wildlife. It is not considered that the railway impacts on the tranquillity of the area to a significant degree, nor that it undermines the ability of the area as a whole to meet this factor.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>dominant feature in the landscape both visually and audibly. The Natural Beauty Assessment states there is only “momentary noise” when a train passes, however the sheer number of trains using the track significantly detracts from the tranquillity of the area and disputes the claim that the “area has a peaceful...character”... Overall therefore, as a result of the significant impact of the railway line the natural beauty criterion is not met over most of the Central Estuary and Southern Slopes in regards to the scenic quality, tranquillity or relative wildness. Furthermore, the impact of the line is felt across the majority of the area due to how narrow the proposed area is...</p> <p>ANON-TK46-6MDS-3 (CLA Response): There are a number of other factors which significantly impact upon the natural beauty of the proposed Stour Estuary area which are not noted in the Natural Beauty Assessment. The Stour Estuary is on the flightpath from Stanstead Airport and is a hotspot for light aircraft so both commercial airlines and light aircraft dominate the skies at all times. This significantly impacts on the relative wildness of the area, as well as the tranquillity when considering the low-flying craft. In February 2018 Stanstead Airport also requested to raise restrictions on annual passenger numbers from 35 million to 43 million so the amount of traffic in the area is likely to increase. Although these planes also impact upon the already designated north side of the estuary, as noted in the 2018-2023 Draft Management Plan, air travel would have made significantly less of an impact when the AONB was originally assessed and designated in 1970. Stanstead Airport only became a commercial airport in 1966 when traffic would have been considerably lower than it currently stands, particularly when considering that since 1970 take offs and landings in the UK have increased by around 275% (Ref 1). Therefore the impact of these planes on the tranquillity and wildness of the AONB is much greater now and should be considered as part of the designation process. There is however no mention of this in the Natural Beauty Assessment, despite aircraft being noted as an example of an indicator that detracts from tranquillity in Assessment Guidance appendix. There are also a number of other factors which significantly impact on the relative tranquillity and wildness, particularly in the areas in close proximity to the B1357 boundary line, including:</p> <ul style="list-style-type: none"> • Particularly noisy existing businesses that operate in the area, including a specialist training centre for security, hostile environment training and outdoor pursuits • Seasonal shoots organised by local landowners • Bird scarers for agricultural use and general disturbance from agricultural activities 	<p>B) Impact of air traffic on relative tranquillity Some noise from large planes at high altitude and occasional light aircraft at lower altitudes was noted during site visits, but air traffic was not considered to be a particularly significant detractor from relative tranquillity in the proposed extensions during the site visits. Arrival and departure mapping and data published for Stanstead airport show that significant numbers of aircraft do overfly the proposed Stour Estuary extension every day, though most fly further to the north over the existing AONB, but all are at altitudes of greater than 6,000ft above mean sea level when they cross it. Required noise mapping for Stanstead does not extend out as far as the proposed extensions as they are not considered to be significantly affected by noise from its air traffic. Whilst air traffic has a slight impact at certain times this is not considered significant.</p> <p>C) Impact of agricultural noise, shooting and other noisy businesses Relative tranquillity was considered to be high over most of the proposed extension. The impact of agricultural activities such as machinery movements were noted as intermittent in the arable area. It was considered to be local and transient and did not significantly reduce levels of tranquillity overall. Noise from other business activities such as the security training operations mentioned by ANON-TK46-6MB2-Z: (BI and Je Mitchell and sons Response) was not noted as having a significant impact. Shooting is an occasional and regular activity on many estuaries within protected landscapes and is not considered to be a major detractor from tranquillity as its impact is localised and frequency sporadic and seasonal.</p> <p>D) Impact of traffic on the B1357 The technical assessment noted some noise intrusion from the B1352 and this does have a localised effect on tranquillity in proximity. This is a fairly busy road but the tributary valleys and undulations in the valley slopes in the area from east of New Mistley to Wrabness significantly reduce noise transmission and most of the area is unaffected.</p> <p>Conclusion Overall it is considered that the area retains a high level of relative tranquillity in most places. Whilst detractors do occur in some places, these are largely intermittent and relatively localised in effect. They are not considered to be intrusive overall and do not affect the ability of the area to meet the natural beauty criterion even in areas where they occur in combination, for example in arable fields adjacent to the railway or the B1352.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<ul style="list-style-type: none"> • Weekly summer motorbike meets of hundreds of bikes between Great Bentley and Harwich along the B1357 • Significant volumes of traffic on occasions when the A120 is closed • A planned motor rally along the B1357 which could become an annual event <p>Again these have been overlooked in the Natural Beauty Assessment, despite traffic noise and 'similar influences' being noted as examples of indicators that detract from tranquillity in the Assessment Guidance appendix and being noted as existing factors that are a problem to maintaining tranquillity in the 2018-2023 Draft Management Plan for the existing AONB. Ref 1: House of Commons Library, 2011. Air transport statistics.</p> <p>ANON-TK46-6MBT-2 (BI and Je Mitchell and sons Response): The Farm is split in the middle by a dual line railway i cannot think of anything more unnatural or man made than a diesel freight train or a electric commuter train powered by lines supported by giant galvanized shiny steel uprights running through the landscape every house and farm building is man made all of the above is definable by being man made and defies the objective of being an area of outstanding natural beauty i think people are allured by the status of the name area of outstanding natural beauty and are blinkered by what is man made . One of the aonb pitches itself on (sic) is tranquillity trains, tractors, birdscarers, planes, combines, sprayers and any other type of farming activity are all noisy.</p> <p>ANON-TK46-6MB2-Z: (BI and Je Mitchell and sons Response): The train line has over 70 trains running daily and this will only increase when the proposed Harwich service station is up and running as the Brantham depot is now being seen as not useable. Also on a Wednesday evening, the frequent roaring of motorbikes can be heard as the motorbike group race in the area from manningtree to Harwich... We are also in a designated flying acrobatic zone which becomes very busy and noisy in summer time... We also rent our land and buildings to a security training company called "Trojan Group". They have 10+ men to each training group. They are an active business who has regular training courses going on. You can hear their gunfire drills, smoke grenades, stun grenades, flares, night time operations where they have full access to the whole farm. They also have foreshore invasion drills and pirate escape and capture. We have met office police and dogs visits which are incredibly noisy day and night. This group have ongoing talks and connections with government security forces and we have been told that they will be having drone activities which I cannot go into any further detail as it is sensitive and classified information. With the unfortunate problems of the</p>	

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>world, we can only expect this business will grow dramatically... I cannot see how fields with gas bangers, farm machinery, busy security/military company, busy train line, pony paddocks, aeroplane acrobatic zone, weekly motorbike rally's can be seen as quite (sic) and tranquil. These do not meet AONB needs.</p> <p>ANON-TK46-6MB7-5 (BI and Je Mitchell and sons Response) Ragmarsh Farm is in Undulating Mqan (sic) made landscape with a Man made main line dual trainline going straight through the farm with over 70 trains per day traveling through it ,also a maintainance (sic) terminal in Harwich has been proposed which will create a lot more traffic of rolling stock coming through the area .With a Flight line to Stanstead frequent acrobatic displays by small planes and security traing (sic) over the 350 acre site by Trojan group including flares and loud devices at all times of the day and night which include above and underground bunkers... Ragmarsh Farm is a man made undulating open intensive modern farm with no trees ,hedges, ditches or wildlife with tractors and machinery working in all seasons and at any time of the day including potatoes creating noise and activity all year..</p>	
<p>Natural heritage features: specific examples</p>	<p><u>Supporting designation</u></p> <p>ANON-TK46-6MMH-1: Including Wrabness of the southern side of the estuary would also recognise the significant geological exposure of the Wrabness beds in the river cliffs facing the estuary - a mixture of mudstones and siltstones, interspersed with volcanic ash bands, which form some of the tallest cliffs in the area. These date from the Palaeogene period/ Eocene epoch, around 55 million years ago and are considered a Regionally Important Geological Site.</p> <p>ANON-TK46-6MZ6-V: The interglacial deposits at Wrabness are linked with those at Stutton and Harkstead on the north bank of the estuary, and together they tell the post-Anglian story, of not only the Stour, but also the Orwell and Deben Estuaries. A story of regional, possibly national importance such that the Wrabness site should be designated along with the rest of the AONB... The geology of the southern valley side of the Stour Estuary is local London Clay (Harwich Formation), giving rise to well-vegetated, undulating slopes. Slope failure has caused landslides in the past and, difficult to cultivate, these have been stabilised with ancient woodland such as Copperas Wood. They</p>	<p><u>Commentary</u></p> <p>A large number of respondents made generic comments relating to why they thought the Stour Estuary extension area overall has high levels of natural heritage interest which contribute to the natural beauty of the area. The majority focussed on the wildfowl and other birds which are drawn to the estuary landscape in large numbers in season. Many respondents focussed on the contribution made by the range of habitats present from the mudflats and saltmarshes of the estuary to the woodlands and fens and their associated flora and fauna. In addition, others commented on the significant contribution made to natural beauty by the geomorphology and geological features of the area.</p> <p>Two of the objectors commented on the removal of trees, hedges and ditches etc from the area around Ragmarsh Farm. Whilst these issues were noted in the assessment of this localised area and do have an effect on the natural heritage present in this area, the proposed extension as a whole contains significant areas of semi-natural habitat and it should be noted that much of the arable area is important for arable birds.</p> <p><u>Conclusion</u></p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>form unusual and attractive features in the heavily cultivated landscape of the Suffolk/Essex border.</p> <p>ANON-TK46-6M9T-S: The whole of the Stour Estuary is an internationally important site for wading birds and other water fowl especially in the Winter and this attracts visitors to view the unique wildlife.</p> <p>ANON-TK46-6MMH-1: I welcome the proposed inclusion of the area at the northern edge of Brantham, which takes in The Woodland Trust property of Pattles Fen. Although relatively small in extent, the woodland, fen and lichen heath habitats accessed by paths and boardwalk are a welcome element of the natural capital of the village and enjoyed by many people.</p> <p>ANON-TK46-6MKA-R: It's nature doing what it does best attracting feeding birds and continuing the circle of life.</p> <p>ANON-TK46-6M5P-H: Salt marshes wooded areas saltings</p> <p>ANON-TK46-6MKS-A: Living locally I see the beauty on a daily basis. The wildlife, especially the swans and other birds that reside here are part of the town and celebrated.</p> <p>ANON-TK46-6M54-N: Many white egrets appear regularly near the White Bridge and it makes no sense not to include both banks of the river all the way up to Dedham</p> <p>ANON-TK46-6M55-P: You will find a number of rare and interesting birds and animal life in this area. In the addition to many species of wildfowl, its relative wilderness lends itself to Yellowhammer, Whitethroat, Turtle Dove, Songthrush, Nightingale, Bullfinch, Barn Owl and Short Eared Owl.</p> <p>ANON-TK46-6M5Q-J: The south side of the Stour estuary is a rich feeding ground for birds and wildlife and should be preserved in as pristine a state as possible.</p>	<p>The comments made in relation the natural heritage of the area are in line with the Natural England Assessment of Natural Beauty which concluded that overall the natural heritage of the Stour estuary area makes a very significant contribution to the natural beauty of the area, attracting many visitors.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>ANON-TK46-6M5A-2: It has many types of habitat for birds, beautiful views across the estuary and some lovely ancient woodland.</p> <p>BHLF-TK46-6MZM-K: It is a valuable bird feeding area for resident and visiting birds.</p> <p>ANON-TK46-6MZZ-Z: ...containing different habitats for bird and wildlife and agriculture</p> <p>ANON-TK46-6MDW-7: It is also an area of considerable aquatic life that could benefit from conservation.</p> <p>ANON-TK46-6M9U-T: They attract an extensive variety of wildlife from the swans, which are there all year round, to wading birds and various migrant birds, some of which are very rare. There is also the nature reserve at Wrabness and other woodland sites along the shore.</p> <p>ANON-TK46-6MBQ-Y: Wildlife habitats, Waterfowl nesting sites.</p> <p>ANON-TK46-6M9N-K: The mudflats to the south provide extensive feeding grounds for many overwintering birds and are recognised internationally. Stour and Copperas Woods are managed ancient woodlands with numerous bird and insect species which attract many visitors to the area.</p> <p>ANON-TK46-6M56-Q: Wildlife habitat. Woodlands.</p> <p>ANON-TK46-6MD2-2: While the AONB is on different grounds to an SSI, the wildlife interest of the area is considerable and the preservation of its beauty and of its wildlife will tend to work together.</p> <p>ANON-TK46-6MMY-J: In Shotley Gate we have the Heritage Park which provides a narrow area of woodland protecting natural foliage and birdlife.</p> <p><u>Objecting to designation</u></p>	

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>ANON-TK46-6MBT-2 (BI and Je Mitchell and sons Response): Ragmarsh Farm is a manmade landscape with all natural assets such as trees, hedges, ditches removed for modern farming purposes. The only thing that is natural in this landscape is the river bed and the tide that comes in and out the rest of it is controlled by man.</p> <p>ANON-TK46-6MB7-5 (BI and Je Mitchell and sons): All of the Area in Bradfield north of Harwich rd is man made with all trees, hedges and ditches removed for modern economical food production.</p>	

4.4 Analysis of Qualitative Responses re. Natural Beauty of the Proposed Samford Valley Extension

C6: Does this area have sufficient natural beauty to be designated as AONB?	
Yes	66
No	5
Not Sure	19

Summary of Responses

A large majority (73%) of respondents who responded to question C6 agreed that the proposed Samford Valley Extension has sufficient natural beauty to warrant designation as AONB. Some respondents submitted their response by letter or email. It was thus not possible to include their responses in the numeric summary table as they did not actually answer question C6, so the figures shown appear lower than the actual response rates overall. The consensus in email and letter responses was also in favour of designation, with no objections

received in these formats.

Four of the seven statutory local authority consultees indicated their general support for the designation of the proposed extensions including the Samford Valley Extension as shown in the table below. They did not make any detailed comments on the technical assessment of natural beauty for the proposed Samford Valley extension. Requests were made for the inclusion of some additional areas to the Samford Valley extension. Since these requests relate to boundary issues they are considered in Section 4.12, the Boundary Consideration Analysis table for the Proposed Samford Extension.

The SC&H AONB Partnership welcomed the proposals to extend the boundary of the AONB and indicated its support for the designation of the areas included within the proposals. No detailed comments were made on the technical assessment of natural beauty for the proposed Samford Valley extension. A request was made for the inclusion of additional land between the proposed extension and the Dedham Vale AONB and also for an additional piece of land adjacent to Stutton. The Dedham Vale AONB Partnership also supported the proposals and proposed the same additions. The Partnerships' comments on the natural beauty of the additional areas which they would like to see included in the proposed extensions are considered further in the Boundary Consideration Analysis tables for the proposed Samford Valley extension.

The five respondents who objected to the proposed extension were three landowners directly affected by the proposal, (two from the same address), a land agent who acts for two of these landowners and the CLA, which reflected the views of its objecting members within the proposed extension. One respondent who identified himself as a landowner with land in the proposed extension supported the proposed extension.

Few respondents apart from the five objectors gave detailed reasons for their views in relation to the natural beauty of this area. All responses were analysed and a number of common themes emerged. Each theme is considered further in the table below with relevant text from responses extracted verbatim under the relevant theme heading.

Responses from statutory consultees, businesses or other organisations have been attributed to them, the remainder are anonymised. A Natural England commentary is provided for each theme raised in relation to this proposed extension, together with a concluding paragraph regarding whether

the evidence submitted in relation to each theme affects our assessment of the natural beauty of the area and the case for whether or not the area warrants designation.

<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
<p>Statutory Authority and AONB Partnership Responses in relation to the Natural Beauty of the proposed Samford Extension</p>	<p>Supporting designation</p> <p>BHLF-TK46-6M99-X: Babergh & Mid Suffolk District Council: The Council welcomes the proposal to extend the boundary of the AONB southwards towards Essex and the inclusion of areas within Babergh.</p> <p>BHLF-TK46-6MME-X: Suffolk County Council: Suffolk County Council: Suffolk County Council welcomes Natural England’s proposals to extend the boundaries of the SC&H AONB... but it considers that the proposal should be amended prior to the preparation of the draft Designation Order as described in the appendix to this letter (analysts note: ie to include more land west of East End and west of Stutton) The extension of the AONB is a once in a generation opportunity to ensure that the Suffolk Coast & Heaths includes all those areas that are worthy of designation.</p> <p>BHLF-TK46-6MDN-X: Ipswich Borough Council: The Council broadly supports proposals to extend the AONB into the candidate areas and thereby to support the conservation of the area’s natural beauty.</p> <p>BHLF-TK46-6MMP-9: Essex County Council strongly supports Natural England’s (NE) proposal to extend the boundaries of the SCH AONB in the areas outlined in the consultation.</p> <p>BHLF-TK46-6M9D-9: Suffolk Coast and Heaths AONB Partnership: In summary the Suffolk Coast and Heaths AONB Partnership response is:</p> <ul style="list-style-type: none"> • To welcome the proposals to extend the current boundary of the AONB • Request that Natural England reviews new evidence for areas that the AONB Partnership consider worthy for inclusion in any order to revise the AONB boundary. <p>BHLF-TK46-6M92-Q: The Dedham Vale AONB and Stour Valley Partnership: The Dedham Vale AONB and Stour Valley Partnership Response is to welcome the proposals to extend the current boundary of the AONB.</p>	<p>Commentary</p> <p>Four of the seven statutory consultees responded positively at a generic level to the proposals to extend the boundary of the AONB, including along the Samford Valley. These general statements of support for the principle of their designation can be taken to demonstrate implicit agreement that the areas have sufficient natural beauty to warrant designation by the fact that they support the proposals, though they do not specifically state this. Although Tendring District Council did submit a response, it not comment on the Samford Valley.</p> <p>None of the statutory consultees or the AONB Partnerships provided detailed comments on the natural beauty of the areas within the proposed extensions, confining their detailed comments to the additional areas which they wished to see included. The consideration of the additional areas that they wish to see included in the proposed Samford extension, including the evidence supplied in relation to natural beauty for their proposed additions is considered separately in the Boundary Considerations tables below.</p>

<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
<p>Comments on Method</p>	<p><u>Objecting to designation</u></p> <p>BHLF-TK46-6MMB-U: The original Boundary Variation Study Area - Suffolk Coast and Heaths AONB Boundary Variation Project Informal Consultation 2016 very clearly shows the area to be considered is a huge area (marked yellow on the map) between the two AONB's up to the Copdock roundabout (A12/ A14 junction) then down to Capel St Mary and then particularly does not include East of A12 from Capel to East End and East Bergholt which shows that this area was never to be considered. The area then considered- Map- Figure 1 Suffolk Coast and Heaths AONB Boundary Variation Project Formal Consultation 2017 – Extent of the Suffolk Coast and Heaths AONB Additional Project Area and the Dodnash Special Landscape Area (marked stripped blue) – the area marked as additional project Area does not include this part from Capel St Mary to East End and East Bergholt again excluding the Dodnash Brook down to East End which shows it should not have even been included.</p> <p>BHLF-TK46-6M9W-V: (Additional information supplied in email to the Chairman of Natural England). Unfortunately the impression that I and a great many others have been given by David Vose et. al. is that this is about adding acreage with not a lot of thought about the consequences just so long as it loosely fits a rather subjective criteria. I also think it is important not to place too much weight on the environmental content of the criteria because usually that is largely reliant upon the land manager and if designation were seen by them as a punishment for their good works then this would not be good. Our breeding waders, within the Dedham Vale AONB, are an example of this where it is not the designated site that makes it the great success that it is but our maintaining the water levels and grass at the correct height and also controlling vermin.</p> <p>ANON-TK46-6MDS-3: CLA Response: According to CLA members, i.e. those who manage and know the land better than anyone else, the landscape of the area to the west is not of high enough quality to be considered for designation as an AONB... With limited public access for on the ground assessment by Natural England in the far west of the area, the assessment of landscape quality by those who have lived and worked in this area should have significant weighting when evaluating the overall natural beauty.</p>	<p><u>Commentary</u></p> <p>Three objectors raised issues related to the method that Natural England follows in undertaking its assessment of whether an area has sufficient natural beauty to warrant designation. These have been divided into the following sub-themes, each of which is dealt with in turn below:</p> <ul style="list-style-type: none"> • A) The extent of the Study Area • B) The weight to be placed on Natural Heritage • C) Assessment of Areas which are not visible • D) Targeting of land under Agri-Environment Agreements <p>A) The extent of the Study Area</p> <p>BHLF-TK46-6MMB-U: The detailed technical assessments set out the approach that was used to identify the areas which have been considered for designation. The approach used followed the approach set out in “Guidance for Assessing Landscapes for designation as National Park or Area of Natural Beauty in England”. This Guidance was approved by the Natural England Board following consultation and published in March 2011. It is referred to as the ‘Guidance’ throughout the remainder of this table. The Guidance was tested and found sound during the Public Inquiry into the recent extension of the Lake District and Yorkshire Dales National Parks and in the Secretary of State’s subsequent confirmation letters. The approach is intended to be flexible and iterative in its application. The process includes the identification of a study area, from which specific evaluation areas are then identified. It is important to emphasise that this initial process is intended to make the practical work of detailed evaluation more manageable and is not intended to lead to the designation or exclusion from designation of any land merely because of the way in which these areas were originally defined.</p> <p>The Initial Study Area was chosen from early desk studies to include land that had already been identified locally for many years as sharing characteristics with the existing AONB or having a local-level designation for the quality of the landscape. These areas were the AONB Partnership’s Additional Project Area and the Dodnash Special Landscape Area. The map mentioned in response BHLF-TK46-6MMB-U was produced by merging these two local-level defined areas onto a single map. Subsequent field work revealed that there were also other high quality areas in immediate proximity to the west of the Initial Study Area. These areas were thus brought within the scope of the assessment and a revised Study Area produced to include them. This iterative process is in line with the Guidance.</p>

<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<p>ANON-TK46-6M9W-V: (Additional information in email to Andrew Sells). Reading the Suffolk Coast and Heaths AONB Review Project Supporting Documents it rather confirms that holders of current and former Countryside Schemes have fairly much been targeted. If there is a lack of take-up of Countryside Stewardship Schemes I can now understand why.</p>	<p>The reasons for the exact alignment of the boundaries of the SC&H AONB's Additional Project Area and the Dodnash Special Landscape Area are not known and in the west they do not reflect the current condition or quality of the landscape, which has clearly been the beneficiary of sensitive and positive land management. The fact that some land was not included within the Initial Study Area was not a reflection of lesser or marginal quality, merely that these pre-existing older locally defined areas were used to help guide the initial studies. Subsequent field work then enabled a refinement of the area under consideration which removed significant areas of land on the Shotley Peninsula Plateau which were within the Initial Study Area and added other areas which were not, such as the tributary valley to the west of the Dodnash Special Landscape Area. This process of ground-truthing is a very important part of the assessment process, enabling refinement of the initial desk-based research results.</p> <p>Land within the proposed extensions was evaluated using the approach laid out in the Guidance. The approach was also quality assured by Natural England's Chief Scientist just prior to the September 2017 Board meeting which approved the technical assessments subject to statutory and public consultation. The assurance process tested the use of the guidance, precedent, published evidence and field evidence which were used as a basis for the recommendation to Natural England's Board on the proposed changes to SC&H AONB boundary.</p> <p>B) Weight to be placed on the natural heritage of the area BHLF-TK46-6M9W-V: The assessment of natural beauty considers the contribution made by a wide range of factors which have been agreed in national landscape assessment guidance over many years as being contributors to natural beauty, as well as in Natural England's Guidance document. Natural heritage is one of these factors; and Natural England considers that the natural heritage features of the Samford area do make a significant contribution to the natural beauty of the area, particularly the natural geomorphology of the valley, but also the semi-natural woodland, flora and fauna which thrive in the area owing to its current sensitive management. Natural England fully recognises the crucial role of land managers in determining the degree and quality of flora and fauna of the area and the sensitive approach apparent in this area. Natural heritage is however only one of the factors which are considered and it is the presence of a range of these factors which gives weight to the case for the designation of the area. There is no ranking of the factors which are considered to contribute to natural beauty and each is weighed on its own merits for the contribution made to the overall level of natural beauty and a judgement made about whether the area has sufficient natural beauty overall to warrant designation.</p>

<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
		<p>C) Assessment of Areas which are not visible ANON-TK46-6MDS-3: CLA Response: Land does not need to be fully accessible in order for a designation to proceed, in fact large parts of many AONBs do not have public access. The process of assessing natural beauty draws on many sources of information both written and photographic and these are backed up by field assessment where access allows. Also as stated in the Guidance, the assessment of natural beauty for landscape designations is not carried out at a field by field level.</p> <p>The Samford Valley area as a whole does however have reasonable public access from both roads and other RoW to enable desk based assessment to be validated in the field. There is good inter-visibility along much of the valley, both from the surrounding lanes near the valley rim and also from the many Rights of Way (RoW) which cross it. The valley is crossed by six footpaths and a lane to the west of the railway; with additional RoW to the east of Brantham Bridge, including one which gives access along the valley floor. Although there are no further RoW crossing the valley floor west of Hustlers Grove, the valley slopes adjacent to the valley floor are visible from both Cutlers Lane and from the RoW south of Hill Farm. Satellite photographs and GI records showed that the small area of valley which was not visible to the west of Hustlers Grove was a continuation of the small, irregularly shaped, attractive meadows and semi-natural habitats which were visible immediately to the west of the RoW across the valley and from the valley slopes opposite Hustlers Grove. The valley slopes above this section of valley floor were however visible, playing an important role in views within the zone of visual influence of the valley system. Their complex interlocking landform contributes to the high level natural beauty visible along the path into the valley from Hill Farm to the north and also from the lanes which run alongside the valley, it was thus concluded that the inclusion of this western part of the valley floor and associated slopes was warranted.</p> <p>Natural England considers that the site visits undertaken in combination with the detailed scrutiny of recent aerial and satellite photographs of the area and other records detailed in the technical assessment have enabled a full assessment of the natural beauty of the area, including those parts which could not be accessed on foot. The professional assessments were written up at length and in a transparent manner and Natural England remains of the view that the findings in relation to the natural beauty of the area were sound.</p> <p>D) Targeting of land under Agri-Environment Agreements ANON-TK46-6M9W-V: Agri-environment holders were not specifically targeted and land ownership was not considered during the assessment process. Current or past</p>

<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
		<p>agreements form part of the wider evidence base used to inform initial early judgements on areas which may have high levels of natural beauty. The map showing current or past Stewardship agreements which was included in the technical assessment was included purely as an example of the suite of maps produced to help inform the initial assessment of whether there were areas of land in the Initial Study Area which were likely to have features of a type likely to contribute to natural beauty. Agri-environment schemes target areas with a range of relevant landscape features, so provide an initial proxy indicator to help identify areas with some features of interest which might be worthy of further investigation. However, agri-environment history was only one of a wide suite of information sources used to help guide the initial area selection process. These included the presence of designated or other cultural heritage features, presence of complex landforms, scenic viewpoints, interesting geology, habitats or specific flora and fauna etc, as outlined in the technical assessment.</p> <p><u>Conclusion</u> Natural England considers that the method by which the area under consideration for designation was selected was open and transparent, and in line with the process laid out in the adopted Guidance for Assessing Landscapes for Designation as National Park or Area of Outstanding Natural Beauty, March 2011.</p>
Reason why land was not designated at the time of the original designation	<p><u>Objecting to designation</u></p> <p>Anon-TK46-6M9W-V: (Additional information supplied in emails to Natural England's Chairman). As I mentioned I am deeply troubled by Natural England's plans to extend the Suffolk Coast and Heaths AONB into areas that are well below the standard of and alien to the existing very special AONB and will surely devalue that which already exists. Unfortunately by devaluing any existing AONB'S, by tinkering around at the questionable edges, one ultimately reduces their effectiveness and the likelihood of their survival in the long term. I am sure that there was a very good reason why these areas were not included when the original designation and that of the Dedham Vale AONB took place.</p> <p>BHLF-TK46-6MMB-U: (Additional information by this respondent but supplied in emails to Natural England's Chairman by Anon-TK46-6M9W-V). There must have been a reason why this area was not originally assigned to AONB either with the Dedham Vale or Suffolk Coast and Heaths.</p>	<p><u>Commentary</u></p> <p>The Designation Histories for both the SC&H and Dedham Vale AONBs formed part of the detailed evidence base which was considered during the early development of the proposals. These confirmed that the natural beauty of the area currently under consideration for designation along the Samford Valley was never assessed at the time of the original designations, nor was it assessed during the two subsequent extensions to the Dedham Vale AONB. This does not mean that the area was considered to have less natural beauty; merely that it was not within the scope of those proposals at that time.</p> <p>It is unclear how the areas under consideration for the original designations were initially selected. In relation to the SC&H AONB, when it was originally considered for designation, no formal assessment was carried out of any land further north or west than the existing AONB boundary on the north side of the Stour. In addition, the land on the north side of the Stour estuary was only included in the original SC&H AONB proposals at a late stage in the original designation process and did not form part of the original proposals. This did not prevent its subsequent inclusion when it was found to meet the criterion for designation. The original Dedham Vale AONB proposal focussed on the central part of the main Stour valley west of Flatford. A series of further proposed extensions have since been considered in relation to the Dedham</p>

<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<p>ANON-TK46-6MDS-3, CLA: There are a number of points which dispute the view that it is desirable to designate the Samford Valley area as an AONB.</p> <p>a. Lack of consensus</p> <p>One of the fundamental questions Natural England must take into account is whether there is a consensus of opinion that an area meets the statutory criteria or should be designated. In the case of the area to the west of the Samford Valley there is not a consensus of opinion, as evidenced below:</p> <ul style="list-style-type: none"> • This area of land was not acknowledged as an area of interest when the original AONB boundary was put in place, nor was it referenced as an area of interest in any further part of the Designation History, or included in the AONB Additional Project Area. The first mention of the inclusion of this area in the AONB is detailed in the Natural Beauty Assessment when the Initial Study Area was extended westwards. Natural England provide no suggestion as to why this area was of no interest to those wishing to extend the boundary. • The Assessment of whether it is desirable to vary the boundary provides no evidence of consensus for the west of the Valley, only mentioning the eastern end of the Samford Valley Extension Area. • Most importantly however, the landowner who owns much of the land to the west of the Samford Valley, and arguably the individual upon whom a designation will most greatly impact, is not in agreement with the designation. <p>The lack of consensus also provides further evidence of the unlikely match of this area with the existing AONB. With a historic lack of interest in the area being part of the AONB it again brings into question why the area to the far west has been included.</p>	<p>Vale AONB and some subsequently designated, bringing in related tributary valleys of the Stour river system which were also considered to meet the natural beauty criterion.</p> <p>As explained above under 'Method', Natural England included a wider area of search to the north of the Stour for completeness because this land was in part designated as a 'Special Landscape Area' or included in the AONB Additional Project Area; but also because the land around Brantham was known to form part of the northern valley sides and setting to the estuary. The technical assessments revealed the presence of additional qualifying high quality areas in tributary valleys to both the rivers Orwell and Stour, including parts of the Samford Valley system further to the west than the SLA and Additional Project Area. The proposed Samford Valley extension includes a highly attractive tributary of the Stour River within the AONB; one which Natural England considers shares many of the characteristics and the high quality of the Stour river system within the existing SC&H AONB.</p> <p><u>Conclusion</u></p> <p>The Samford Valley was not assessed during the original designation process for either the Dedham Vale or SC&H AONBs. This fact does not however mean that the area had a lower level of natural beauty, merely that it was not considered at that time. Assessment of the broader Samford area has revealed that much of the Samford Valley is considered to meet the natural beauty criterion. Natural England considers that a robust assessment has now been undertaken of the area. As detailed in the technical assessments, this revealed that areas of land within the Samford Valley have sufficient natural beauty to warrant designation as AONB. Natural England remains of this view.</p>
<p>Landscape and scenic quality, including comparisons with SC&H AONB or Dedham Vale AONB</p>	<p><u>Supporting designation</u></p> <p>ANON-TK46-6MMH-1: The valley and its watercourse are typical of the smaller side valleys that feed into the main Stour Valley. Their high landscape quality comes from a combination of habitat diversity, intimacy and relative tranquillity. Of particular landform interest is the strongly meandering course of the Dodnash Brook as it flows across a relatively wide floodplain in its middle and lower reaches.</p> <p>ANON-TK46-6M53-M: This area is similar to that already covered by the existing AONB and well worthy of inclusion.</p>	<p><u>Commentary</u></p> <p>Many non-statutory respondents supplied additional generic comments to support their view that the area has sufficient natural beauty to warrant designation but without giving a great deal of detail. Natural England agrees with the respondents who commented on the intimate nature of the river valley, its interesting topography and other individual features that contribute to the high levels of landscape and scenic quality and visual interest in this area. The comments made by these supportive respondents are in line with the information and conclusions in the Natural England technical assessments.</p>

<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<p>ANON-TK46-6MDZ-A: This is self evident if you are on site. It is quite unique and fits in with the estuary landscape well.</p> <p>ANON-TK46-6M55-P: It shares many of the same aspects and geography of the existing AONB area on the north shore of the river. Together they are an important landscape unit.</p> <p>ANON-TK46-6MM4-D: Important valley and woodland.</p> <p>ANON-TK46-6M9N-K: This is a beautiful area which plays host to many native species and is particularly spectacular in the spring</p> <p>ANON-TK46-6MDZ-A: This is self evident if you are on site. It is quite unique and fits in with the estuary landscape well... The current designated area is only one side of the estuary, it makes much greater sense to designate both sides and so give protection to the entire estuary.</p> <p>ANON-TK46-6MDT-4: As an employer in a City of London financial business looking to attract employees to the area, it seems critical that the features that make coastal Suffolk attractive are preserved on sufficient scale to have a meaningful impact for the region as a whole. The proposed expansion would help to achieve that by including areas that unambiguously deserve such protection.</p> <p>ANON-TK46-6M9J-F: We support the proposed extensions to the Suffolk Coast and Heaths AONB, the area is of high environmental value and we are therefore pleased to see the designation being extended to recognise this.</p> <p>ANON-TK46-6M9Z-Y: Once again beautiful farmland and woods.</p> <p>ANON-TK46-6M96-U: Certainly, this area lies at the heart of the Dodnash SLA and has very special and historic qualities. Ancient woodlands are of great interest and importance.</p> <p>ANON-TK46-6MDW-7: We strongly believe this area has a natural claim to be designated as an AONB as it provides, for Suffolk, an unusual 'contour relief' with some rolling hills that help to emphasize the more usual level of the surrounding countryside... Although arable and</p>	<p>A number of respondents including the five objectors, made comments about the character and/or quality of the area or whether there were similarities with land in the two neighbouring AONBs. The responses often cover both character and quality points intermingled in their text. It is not easy to disentangle these separate issues without losing the flow of the respondents' text, so their relevant text is shown verbatim to the left. To aid clarity in the Natural England commentary, a range of sub-themes raised in the responses have been identified and each is considered separately. The sub-themes are:</p> <ul style="list-style-type: none"> • A) Characteristic natural beauty • B) Landscape character and character comparisons • C) Comparison with other designated landscapes • D) Insufficiently conservative boundary in areas of transition • E) Links to existing AONBs • F) Linear nature of the extension • G) Inclusion of area around East End • H) Exclusion of development sites • I) Land included in the extension is the same as the land between the proposed extension and Dedham Vale AONB. • J) The area is not outstanding <p>A) Characteristic natural beauty: Character alone is not a valid reason for including or excluding land (as noted by the Inspector in the Report on the Re-opened South Downs Inquiry (IR2, para 2.45 to 2.48)); the natural beauty criterion does not require 'characteristic' natural beauty. A designation can contain different landscapes, so long as the designation as a whole satisfies the natural beauty criterion. As an example, the Lake District National Park contains 13 different landscape types with widely differing character. ANON-TK46-6MDG-Q commented that the area does not contain any heathland, suggesting that it as a result it did not fit in with the Suffolk Coast and Heaths AONB. In addition ANON-TK46-6MDS-3: CLA Response suggested the varying character of the area is evidence that it does not fit within the AONB. The technical assessment revealed that the area has sufficient natural beauty in its own right to warrant designation. Whilst heathland is a key landscape type in the wider SC&H AONB, the fact that the proposed extension does not include much heathland does not preclude its designation. The technical assessment did however record that in places, parts of the Samford Valley extension do exhibit some former heathland characteristics and flora, particularly in hedgerows, woodland edges and grassy areas on the higher valley slopes where sandy, acid soils occur and that the valley area shares many typical</p>

<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<p>livestock farming is the main commercial activity of the area it is also well wooded and has the added advantage that many land owners, including ourselves, have, during the past five or six years, planted thousands of indigenous saplings.</p> <p>ANON-TK46-6M9N-K: It is an unexpected haven of tranquility (sic) with its softly undulating landscape which is so different from the estuary.</p> <p>BHLF-TK46-6MMW-G: It supplements and provides variety to the estuary landscapes adjoining... I agree with the 'significance' set out on Page 13 (of the Consultation Document) and whilst the overall landscape is 'gentle & rolling' the valley is steeper than others in the area & provides a valuable contrast to the more open vistas in the AONB.</p> <p>ANON-TK46-6MKV-D: It is stunning and deserves to be incorporated.</p> <p>ANON-TK46-6MBV-4: Its obvious good scenery.</p> <p>ANON-TK46-6MBW-5: It's breath-taking.</p> <p>BHLF-TK46-6MDE-N: The proposed extension will complement the present illogical boundary. The Essex side of the river is of equal quality to the Suffolk side.</p> <p>ANON-TK46-6M5Q-J: The tidal estuary only makes sense as a whole area, i.e. both north and south sides of the estuary.</p> <p>ANON-TK46-6MDM-W: This will correct a longstanding anomaly whereby the whole landscape unit of the estuary and valley has to be treated as Outstanding.</p> <p>BHLF-TK46-6MMM-6: To balance the ANOB (sic) on the north bank of the River Stour</p> <p><u>Objecting to designation</u> ANON-TK46-6MDS-3: CLA Response: The proposed area does not have sufficient natural beauty to be designated as an AONB for a number of reasons, as described below. These have been overlooked or underestimated in the Natural England assessments. a. Quality of the</p>	<p>characteristics of the tributary valleys of the Stour river system of which it is a part. It is accepted that the upper fringes of the valley are in a zone of transition to a plateau character but the area included within the proposed extension lies well within the zone of transition in quality and retains valley characteristics and a range of landscape features which lift the landscape quality above that of the surrounding plateau areas which have largely been excluded.</p> <p>B) Landscape character and character comparisons An understanding of landscape character is relevant to assessing natural beauty in that it provides a spatial framework for assessment and information on factors which contribute to natural beauty, often gained through the undertaking of a Landscape Character Assessment, a well-established tool for recording landscape character. Landscape Character Assessments (LCAs) are undertaken in line with nationally produced guidance. <u>Character</u> is not however the only determinant of natural beauty. The evaluation process primarily considers the <u>quality</u> of the area, through assessment of the contribution that a range of agreed factors make to natural beauty.</p> <p>Whilst similarity of character is not a requirement for designation as stated below, Natural England agrees with those respondents who commented that the Samford area is in many ways similar in character to areas within the existing AONB. In its detailed technical assessment of Natural Beauty, Natural England also noted the degree to which the area shares the character and qualities of the typical short, sloping, river valley structure of the small streams flowing into the Stour and Orwell within the existing AONB; and as a whole differs from the surrounding and adjacent open, flat plateau landscapes. It further noted the similarity of character and qualities with the small tributary valleys of the Stour which lie within the Dedham Vale AONB.</p> <p>The CLA response correctly identified that there is a transition in the landscape character towards the head of the tributary valley systems as the valleys become shallower and plateau character becomes stronger. They also suggest that since the area has multiple soil types and sits near the boundary of 3 National Character Areas, the area is transitional in character and does not fit within the AONB. As stated above under 'Characteristic Natural Beauty', similarity of character is not a requirement for designation. Also at a local scale, soil types can vary significantly, particularly where valleys cut through and expose differing underlying geology at different altitudes as is the case in the Samford area. This is the case in many landscapes and does not necessarily signify a difference or transition in landscape or scenic quality.</p> <p>Likewise the fact that the area lies near the boundaries of three national level character areas does not signify that the quality of the whole area is transitional.</p>

<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<p>land. According to CLA members, i.e. those who manage and know the land better than anyone else, the landscape of the area to the west is not of high enough quality to be considered for designation as an AONB. This is judged against land in other AONBs which is considered to be of higher quality. The CLA questions whether it is necessary and desirable to designate additional areas of land that do not have outstanding natural beauty because we are of the view that if the area does not meet the natural beauty criterion, we believe this designation runs a very real risk of diluting the value of those areas already designated. With limited public access for on the ground assessment by Natural England in the far west of the area, the assessment of landscape quality by those who have lived and worked in this area should have significant weighting when evaluating the overall natural beauty. There are, however, a number of pieces of evidence to support the view that the area is not of high enough quality:</p> <ul style="list-style-type: none"> • The complex nature of the proposed boundary provides evidence of the changeable quality of land in the area. Natural England state that “Natural beauty often changes gradually over a sweep of the 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 exclude area of less quality”. This is further discussed throughout the documents which confirm that boundaries must be drawn conservatively. Due to the quality of the land, discussed above, it could be argued that the boundary is not conservative enough. • The land towards the far west of the valley is particularly transitional. This is acknowledged a number of times in the Natural England documents, including on page 24 of the Boundaries Consideration document where the document states “the Samford valley character is progressively lost and the plateau character starts to dominate”. This in turn impacts upon the quality of the land in this area, as acknowledged by Natural England in the Assessment of whether it is desirable to vary the boundary, which states that “within the Samford Valley Extension the nature of the transition in natural beauty from higher quality valley land to the lower quality plateau is variable.” • The transitional nature of the land is evidenced on a number of key maps available through Natural England, including soil maps. The change in soil type from freely draining slightly acid sandy soils on the north side of the Orwell, to the freely draining slightly acid loamy soils along the Shotley Peninsula to the slightly acid loamy and clayey soils 	<p>Landscape character was not used to define the boundary. Landscape character differs from landscape quality and whilst the proposed extension largely contains land with a valley character, the assessment concentrated on whether the land was of high enough quality owing to the presence of a range of differing factors. It was the degree of transition in quality and the extent of visual connection with the valley system which were used to determine where the precise boundaries were placed. Areas which were considered to be at the lower end of the transition in landscape and scenic quality were generally excluded from the boundary unless they were important in views either towards or away from the valley system, where the zone of visual influence was also a determinant in boundary selection.</p> <p>C) Comparison with other designated landscapes Several respondents compared the natural beauty of the land within the proposed extension against the level of natural beauty found in other designated landscapes, eg ANON-TK46-6MDS-3: CLA Response. It was established during the South Downs Public Inquiries that the test for inclusion of land within a National Park or AONB is not quality comparisons with other nationally designated areas or adjacent areas, but against wider ordinary countryside. The areas included within the proposed extension generally contain sloping or valley character and other features which increase the level of natural beauty compared with the surrounding areas of open, flat plateau land which are typical of the wider inland countryside found across much of the counties of Suffolk and Essex. These features are described at length in the detailed assessment of natural beauty. Areas with solely plateau character have generally been left out of the proposed extension as having insufficient natural beauty, the exceptions being where features of interest on the valley slopes extend up onto the plateau, such as ancient woodlands. ANON-TK46-6M9W-V suggests that the inclusion of the Samford Extension will dilute the quality of the existing AONBs, Natural England considers that it has excluded lower quality areas of typical plateau landscape and that the currently proposed boundary contains areas with a valley morphology and other features which raise the quality of this area above that of the area of flat plateau between the existing Dedham Vale AONB and the proposed extension.</p> <p>D) Insufficiently conservative boundary in areas of transition ANON-TK46-6MDS-3, CLA, suggests that due to transitions in character and quality, the boundary is not conservative enough in the far west. In relation to landscape character, boundaries between landscape areas and types within the local Landscape Character Assessments (LCAs) are drawn at a broad level / low resolution and should not be relied on for detailed assessment. It should also be noted that the local LCAs/NCAs do not use the rim of the valleys as the cut off between landscape areas. In places, areas which are shown in the LCAs as having plateau character, do in fact</p>

<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<p>with impeded drainage on the south side of the Shotley and spotted around the Peninsula would indicate this is a transitional area with mixed habitats.</p> <ul style="list-style-type: none"> This is further evidenced using the National Character Area maps which show that the Samford Valley lies on the boundary of the Suffolk Coasts and Heaths National Character Area, the South Suffolk and the North Essex Claylands and Northern Thames Basin which again would therefore indicate it is a transitional area on a more regional scale. <p>When considering the evidence above, and the transitional nature of the land towards the west of the valley, the boundaries should be drawn more conservatively to reduce the influence of the transitional land which, if designated, would significantly dilute the quality of the land included in the AONB.</p> <p>ANON-TK46-6MDS-3: CLA Response: The concept of ‘characteristic natural beauty’ as an issue was clarified as a result of the 2nd South Downs Public Inquiry, concluding that land does not have to share the character of an existing AONB in order to be included with it. It should however still be noted that the transitional nature of the area and significantly varying characteristics, as noted above, provides evidence that the area does not naturally fit within the AONB. As a result, the area to the far west should not be included in the proposed extension.</p> <p>ANON-TK46-6MDG-Q: It is not a particularly beautiful part of countryside. There are no special conservation habitats in the area. There is no heathland in this area... I own land in the Dedham Vale AONB which I fully support as deserving to be properly in the AONB. However this new proposed area of the Samford valley, in which I also own some land, is simply not beautiful or special enough to warrant AONB status. Its inclusion will reduce the impact of the rest of the AONB.</p> <p>ANON-TK46-6M9R-Q: Mark Westward Ltd Response: The consultation document says (sic) that the area of land between the Dedham Vale AONB and this proposed extension does not meet the natural beauty criterion. I agree with this statement. However, the fact the proposed extension now includes large chunks of land very similar in character to the area between the two AONBs, I believe is NE trying to have as large an AONB area as possible rather than trying to maintain, improve and enhance the quality of the existing AONB with an</p>	<p>have significant valley characteristics. There is a zone of transition between the two relevant landscape areas in the local level Landscape Character Assessment (Samford Valley and Shotley Peninsula Plateau) along the Samford Valley where character and quality change, not necessarily at the same rate, which is not reflected in the LCA boundaries. Site visits confirmed that the level of natural beauty was not accurately reflected in the landscape character area boundaries in the local LCA. For this reason the proposed boundary does not follow the boundaries between the Samford Valley and the Shotley Peninsula Plateau Character Areas.</p> <p>The proposed boundary mostly follows the break of slope between the Samford Valley system and the neighbouring plateau areas. The complex boundary chosen around the proposed extension largely reflects and takes account of the nature of the transition in landscape quality found towards the edge of the Candidate Area. Areas at the lower end of the transition in quality were generally left out and the boundary drawn to the nearest appropriate hard feature within the higher quality areas.</p> <p>In a few places, sloping arable fields of more marginal quality on the valley slopes were included in the proposed extension. This was generally due to their importance in the zone of visual influence of the valley. These slopes were important in views from the opposite side of the valley as part of the overall sweep of the valley slopes and also in views from the valley itself. The Guidance makes clear that visual associations may be used to help define the extent of land for inclusion in transitional areas. Additionally, in a few small areas, the boundary also reflects the need to find a pragmatic boundary in areas with few suitable features.</p> <p>In the Samford Valley visual associations were used to help define the extent of transitional land which was included in the proposed extensions. This is particularly the case towards the heads of the small tributary valley systems eg in the west of the area where the valleys become shallower and narrower but are still clearly visible from the surrounding plateau. In addition, a large arable field, part of which is steeply sloping, to the south of Hill Farm and which has more marginal natural beauty and is crossed by a line of pylons, also lies within the zone of visual influence (ZVI) of the valley. This was included within the proposed boundary. Its inclusion was felt to be warranted partly due to the fact that it is an intrinsic part of the main valley sides, visible from many places and partly due to the contribution made by its steeply sloping nature and the contrasting patterns of its vegetation to the attractive views of the valley available from the lane on the rim of the other side of the valley and local RoW within the valley system. Notwithstanding the line of pylons, this sloping part of the field was felt to be an intrinsic part of the sweep of the Samford Valley slopes, contrasting attractively with the small irregular pasture fields immediately to the west</p>

<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<p>appropriate sized quality extension. In summary, the area includes areas of very low natural beauty.</p> <ul style="list-style-type: none"> •There are some small areas within the proposed extension that will enhance the existing AONB, but the proposed extension significantly reduces the high quality of the existing AONB. <p>BHLF-TK46-6MMB-U: (Additional information supplied via email to Natural England's Chairman by ANON-TK46-6M9W-V): I do not consider the Samford valley extension either part of the Dedham Vale or Suffolk Coast and Heaths, it is a relatively pretty but a narrow valley running up Dodnash Brook and not adjoining either AONBs, footpaths already cross it but do not run along it and it is not 'Outstanding' in beauty.</p> <p>BHLF-TK46-6MMB-U: Formal response. There are parts that are pretty but these are few and not linked to either the exciting (sic) AONB or would link together (sic). As a package there is not sufficient natural beauty in the proposed area or enough of an area on its own and it does not link well with the existing AONB. To the West noise of A12 and pylons have no beauty, Great Martin's Wood and some of Dodnash Wood might have some beauty but this small hill is not linked to either side. The area around East End is particularly unattractive and as more houses are being built should certainly not be included.</p> <p>BHLF-TK46-6MMB-U: Of the huge area originally considered this small linear proposed extension does not link or enhance with the existing Dedham Vale or Suffolk Coast and Heaths AONB. The existing AONB's are outstanding in their block with views covering the Stour Valley/ Estuary features but the small valley of Dodnash Brook is rather poky, small, narrow and suburban, the boundary winds around every potential development taking place and proposed in East Bergholt (Mill Road 78 house development), East End (Manor Farm proposed 15 house site), Brantham (houses built along A137) and Bentley (Garden Centre development site and adjoining field) which is going to impact on the proposed area, down grading it to no specific beauty. I would strong (sic) argue that the Samford Valley Extension west of A137 should not be included at all.</p> <p>ANON-TK46-6M9W-V: Relating mostly to the Western end of your proposed extension: 1. Scale: The Western end of this extension is</p>	<p>and broadleaved woodland to the east, particularly when seen from the other side of the valley and from the valley floor. A pragmatic boundary was chosen in this area to include the parts of the field which are an intrinsic part of the valley slopes.</p> <p>Areas within the proposed boundary which lie within the transition in quality were re-considered in detail after the informal consultation and some areas were removed from the proposed boundary where they were considered to be in the lower quality end of the transition and at the margins of the Zone of Visual Influence. Land within the proposed extensions has clear visual links either to or from parts of the valley system and the area as a whole is considered to sufficiently meet the natural beauty criterion.</p> <p>E) Links to existing AONBs BHLF-TK46-6MMB-U comments that the area does not link with either the SC&H or Dedham Vale AONBs. Natural England considers that there are clear and strong physical links with the parts of the Stour Estuary slopes already lying within the existing SC&H AONB. The Samford Valley runs continuously inland from the Stour estuary itself, crossing through the estuary slopes at Stutton within the existing AONB, before turning west and running inland. In geological terms is clearly a tributary valley of the Stour River system. Elsewhere in the area, entire qualifying tributary valley systems have been included within both the SC&H and Dedham Vale AONBs, including in the later extensions to the Dedham Vale AONB. Part of the Samford Valley, south of Stutton Bridge already lies within the AONB and the area of high quality landscape does not coincide with the existing AONB boundary, continuing inland along the proposed Samford extension.</p> <p>F) Narrow linear nature of the extension ANON-TK46-6M9W-V: Since the proposed extension is based on a tributary river valley, it is inevitably relatively linear in nature. This does not prevent it from having sufficient natural beauty for designation. In particular, Natural England agrees with respondents who commented that the landform of the proposed Samford Valley extension with its varied topography, makes a very significant contribution to the level of natural beauty and in particular to the highly scenic nature of views in this area. This is the case both from the valley slopes as well as from the valley floor. This was described in detail in the scenic quality section of the technical assessment of natural beauty. The geomorphology of the whole of this tributary valley with its complex, branching landform contributes to both landscape and scenic quality and together with the extensive sloping woodlands is a key determinant of the attractive 'hidden', secluded and intimate nature of the area. This proposed extension in combination with the existing AONB forms a significant area of high quality riverine landscape. When</p>

<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<p>peninsular-like and rather unexciting country with some not too special views. The pretty but limited, narrow strip of meadows running down the sides of Dodnash Brook is obviously the AONB target but to give the proposed extension scale a whole load of very ordinary country with some unattractive views has clearly been added in to 'Beef things up'. This seriously undermines and devalues an AONB designation. ... The woods, hedges, irregular-shaped meadows and wet pasture are only as they are because land managers and landowners, often very recently, have reverted arable land back to grass, planted hedges, replanted woods etc.</p> <p>ANON-TK46-6M9W-V: The consultation document states that the area of land between the Dedham Vale AONB and this proposed extension does not meet the natural beauty criteria. I agree with this statement. However, the proposed extension, particularly at the Western end now includes large chunks of land very similar in character to the area between the two AONBs. This "padding out" of the tiny area of pretty, not outstandingly beautiful, land makes a mockery of existing, deserving AONB's which will not survive in the long term if they diluted by areas such as this</p> <p>ANON-TK46-6M9W-V: (Additional info supplied to Chairman of Natural England): With regards the Samford Valley Extension, I really cannot understand why any land to the West of the A137 is even being contemplated as although the country is pretty in part, especially at this time of year, it is certainly not outstanding, is certainly not remote and is far from tranquil. The valley is, if analysed, really only a narrow backbone of grass, arable reversion in our case, with, particularly at the western end, some very ordinary agricultural land on either side of it and woodland much of which was replanted, by my family, shortly after the gale in 1987 when we lost 80% of our woodlands... There are plenty of areas of low scenic quality and a very dominant line of pylons running straight through the meadows that Natural England appear to have fairly much turned a blind eye to...</p>	<p>viewed as a whole with the existing AONB, the linear nature of the proposed extension when taken in isolation is lost, since it appears as one of the many tributary valleys included within the wider SC&H AONB.</p> <p>G) Inclusion of area around East End BHLF-TK46-6MMB-U: In relation to the suggestion that 'the area around East End is particularly unattractive and ... should certainly not be included': The part of the valley system north of East End has an attractive landform with several small valleys running down into the main valley. These and other landscape features such as the woodland, pasture and arable fields combine to create attractive landscape compositions. These are visible in places from the road and also from Rights of Way (RoW) leading down to the main valley from both East End and Brantham villages. These RoW offer access to areas of high landscape quality adjacent to the settlements. The area is also visible in places from the north side of the valley. The village of East End, lies on the edge of the plateau, is mostly well screened from view by vegetation and was excluded from the proposed extension. Only the roofs and fence line of properties in Broom Knoll are visible from the immediate vicinity within the proposed extension and they are not considered to be a significant detracting or dominant feature in the area overall as they are not visible from most of the area within the valley system.</p> <p>H) Exclusion of development sites In relation to the comments about the proposed boundary winding around every potential development site at East Bergholt, East End, Brantham and Bentley (BHLF-TK46-6MMB-U); existing and consented housing allocations and permissions are normally excluded from potential AONB extensions, and where these are known about they have been excluded. The boundary however only reflects potential developments which are either supported in local plan policies or have been approved through the planning process. In this area the boundary largely reflects the edge of the zone of visual influence of the valley system, thus excluding the surrounding plateau areas. It is thus coincidental if some sites under potential consideration for development in flatter areas adjacent to the existing settlements have been left out.</p> <p>I) Land included in the extension is the same as the land between the proposed extension and Dedham Vale AONB. The areas which were included within the proposed extension contain sloping or tributary valley characteristics and other features which contribute to natural beauty. The surrounding plateau areas are generally above the 30-35m contour lines, open and flat and lie outside the break of slope of the tributary valley which forms the basis of the proposed Samford Valley extension. The proposed extension thus contains land with a different character and higher quality than the areas of flat plateau farmland lying between the Dedham Vale</p>

<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
		<p>AONB and the area proposed for designation. Areas with solely plateau character have generally been left out of the proposed extension as they were deemed to not have sufficient natural beauty.</p> <p>J) The Area is Not Outstanding: ANON-TK46-6M9W-V: Regarding the comments that the area “is pretty in part, especially at this time of year, it is certainly not outstanding...” and that it is just the ‘pretty but limited, narrow strip of meadows’ that has natural beauty in this area. Natural England considers that the valley as a whole including both the valley floor and also its surrounding valley slopes, with their complex branching side valleys, extensive semi-natural woodlands and mixed land use all contribute to the pleasing and contrasting patterns and colours and changing views throughout the valley system. As a whole, the valley system comprising both the valley floor and the slopes up to the rim of the valley, has a high level of natural beauty with high levels of inter-visibility in many places throughout the area and a strong element of surprise owing to the emerging vistas and hidden valleys as one passes through the area. Natural England also agrees with other respondents who commented that the native and semi-natural woodlands on the valley slopes and parts of the surrounding plateau, as well as the watercourses also play significant roles in the high scenic quality of the area, creating seasonally changing patterns and textures and varying colours which are highly pleasing to the eye and supporting a range of natural heritage features such as spring flowers which also contribute to scenic quality. The area was fully assessed and the reasons why the area as a whole is considered to have sufficient natural beauty are detailed at length in the technical assessment documents. Natural England agrees with the many respondents who commented on the special qualities of this area and remains of the view that this proposed extension as a whole is of high landscape and scenic quality and meets the criterion for designation as AONB.</p> <p><u>Conclusion</u></p> <p>The Guidance and past precedent make it clear that both the character and quality of an area should be taken into account in assessing natural beauty. Character provides a suitable spatial framework for evaluation, and elements of character can contribute to natural beauty. However, neither diversity of character, nor a transition in landscape character, are an obstacle to designation if the qualities of the area are considered to meet the criterion of natural beauty.</p> <p>Natural England remains of the view that the proposed Samford extension is of sufficient quality to warrant designation, particularly in the context of the SC&H AONB as a whole. Natural England notes the fact that many respondents also expressed this view. Land in the transitional areas around the proposed extension was examined in</p>

<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
		<p>great detail during the assessment process and again after both the informal consultation and the statutory consultation. Only land at the higher end of the transition in quality or which was also clearly in the zone of visual influence of the tributary valley system has been included within the proposed boundary.</p> <p>Natural England agrees with the respondents who state that the inclusion of the additional land at Samford will enhance the existing AONB, through the inclusion of additional, immediately adjacent and contiguous qualifying land and is satisfied that the transitional areas have been reflected adequately in the proposed boundary.</p>
<p>Impact of incongruous features on landscape and scenic quality</p>	<p><u>Supporting designation</u> ANON-TK46-6M9H-D: A largely unspoilt area of natural beauty.</p> <p>ANON-TK46-6MB9-7: another very special and unspoilt area of outstanding natural beauty</p> <p><u>Objecting to designation</u> ANON-TK46-6M9R-Q: Mark Westward Ltd Response: Take into account the electricity pylons that run right through the middle of the western end of the proposed extension, defacing any possibility of the area's natural beauty. There is a railway line right through the middle of the proposed extension defacing any possible natural beauty In summary... •The area includes areas that are of low scenic quality, including a line of pylons and a railway line.</p> <p>ANON-TK46-6M9W-V: Incongruous features a. A line of permanent, highly unattractive and dominant pylons runs straight through the middle of the proposed AONB extension! This I find odd. The pylons are acknowledged in the Natural Beauty assessment as locally dominating features but their impact has been grossly understated in the Natural England assessments. b. There are many examples of dominant and obtrusive housing all of which detract from views within the proposed extension. Broom Knoll at East End, The Grange Country Park, off the Straight Road and Chaplain's and Hill farms to the far west of the extension are all prime examples. c. The A12 can be clearly seen and heard from as far away as Great Martin's Hill Wood. Constantly noisy and moving this is certainly not</p>	<p><u>Commentary</u> Whilst two supporters of designation made general comments about the unspoilt nature of the area, the five objectors made a range of more detailed comments about the impact of Incongruous features on landscape and scenic quality in particular parts of the proposed extension. Some responses also contain comments related to the impact of the incongruous features on tranquillity, these are considered separately in the Tranquillity section below. To aid clarity in the Natural England commentary, a range of sub-themes have been identified and are considered separately. The sub-themes are:</p> <ul style="list-style-type: none"> A) High Voltage Power Cables B) Transport corridor at Brantham Bridge, A137 and Mainline Railway C) A12 Road D) Housing E) Quality of Woodland F) 'Horsiculture' G) Arable area at Manor Farm to Alder Carr H) Sewage works at Brantham <p>A) High Voltage Power Cables The high voltage power cable which crosses the valley west of Kings Field (mentioned by the five objectors), was noted during site visits as having a localised effect on landscape quality in areas in close proximity in the valley system, and being a locally dominating feature where it crosses the open arable slopes on the Right of Way south of Boynton Hall. This was reflected in the technical assessments. However the impact of the power lines on the extension area as a whole is relatively limited in extent due to the winding nature of the valley; the fact that the pylons sit low, below the skyline, as they cross the valley itself; and due to obscuring vegetation in this heavily wooded area, which limits the extent of their influence within the valley system overall.</p>

<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<p>AONB material.</p> <p>ANON-TK46-6M9W-V: (Additional information supplied via email to Natural England's Chairman): There are plenty of areas of low scenic quality and a very dominant line of pylons running straight through the meadows that Natural England appear to have fairly much turned a blind eye to.</p> <p>ANON-TK46-6MDS-3: CLA Response : Incongruous features A line of permanent pylons splits the area to the west of Kings Field from the rest of the proposed area. The pylons are acknowledged in the Natural Beauty assessment as locally dominating features. These pylons significantly undermine the natural beauty of the area, impacting upon the landscape quality, scenic quality and relative wildness, standing as an overwhelming feature that can be seen from a significant distance. This has been understated in the Natural England assessments. The A12 also stands as a dominating incongruous feature in exceptionally close proximity to the proposed boundary. As discussed above, the impacts of the incongruous features and the transitional, lower quality of the land to the far west has been understated. The assessment largely overlooks the significant impact these have on the natural beauty and subsequent suitability of the area as an AONB.</p> <p>ANON-TK46-6MDS-3: CLA Response: As discussed above, the transitional nature of the area to the far west of the Samford Valley and the subsequent impact this has, along with the incongruous features, upon the natural beauty has been largely overlooked. Although some efforts have been made by Natural England to draw the boundary back, the boundary is still not conservative enough.</p> <p>BHLF-TK46-6MMB-U: From Rookery to Kings Field the huge pylons walking through the valley is certainly not 'Outstanding Natural Beauty' which leaves a small area from Holly Wood down to Great Martin's Hill Wood which might have natural beauty but is covered by Ancient Woodland protection and is too small an area to have as an AONB on its own and does not link up with the other two AONBs. The north end of Holly Wood is flat, a working chestnut coppice, narrow with a forestry extraction track down the centre and I cannot see any reason or natural beauty to include it in an AONB. Dodnash Wood to Dodnash Fruit Farm is an unexciting wood with many pony paddocks, ticker tape</p>	<p>Within the proposed extension, the visual impact of the pylons is largely limited to their immediate proximity in the two large fields on the open valley slopes west of King's Field. As stated previously, these fields were included partly due to their sloping landform and their contribution to views from elsewhere in the extension (they form an intrinsic part of the valley slopes and are clearly within the zone of visual influence of the valley); and partly owing to the need to find a pragmatic boundary in an area where few other features were present. Elsewhere within the valley it is judged that the presence of other features which contribute to the otherwise very high levels of natural beauty in the valley areas adjacent to where the power lines cross it, outweigh the localised impact of the power line itself. These features are detailed in the technical assessment.</p> <p>The inclusion of the area crossed by the power line within the proposed Samford Valley extension is consistent with precedent elsewhere where similar circumstances pertain. The same high voltage power line also crosses the Dedham Vale AONB slightly further to the south, near Judas Gap weir. At the time of the designation of the Dedham Vale AONB, the significant impact of this power line crossing the more open Dedham Vale was also noted in assessments, but was not considered sufficiently large to affect the subsequent designation of that area.</p> <p>B) Transport corridor at Brantham Bridge, A137 and Mainline Railway The technical assessment noted an area of lower landscape quality at Brantham Bridge, due to the localised visual impact of the A137 road and railway where they cross the valley in close proximity, fragmenting the valley physically and visually. However as stated in the technical assessment, the winding valley morphology limits the area which is visually directly affected by these incongruous features, to the extent that it is not considered to substantially detract from the otherwise high levels of natural beauty elsewhere in the area or affect the ability of the valley landscape as a whole to meet the natural beauty criterion. The wider valley system is largely unaffected. Away from the immediate vicinity of Brantham Bridge, the area of high landscape and scenic quality continues along the whole valley system as far west as the A12 and to the east to where it meets and continues through the existing AONB boundary at Stutton Bridge. The existing AONB boundary at Stutton Bridge does not reflect the high quality of the valley landscape further inland. The inclusion of the small area affected by the transport corridor at Brantham Bridge enables the much larger area of qualifying land to the west of the railway be included within the AONB. It is made clear in the Guidance that assessment of the area is not at a field by field level and that there is no requirement that every parcel of land must meet the natural beauty criterion. Natural England considers that in relation to the proposed Samford extension as a whole, the area affected by the transport corridor is relatively small and</p>

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	<p>surrounding it and I argue is not of any beauty. Manor farm to Alder Carr is unexciting flat arable land on the edge of East End a particularly ugly newish village. The railway line and A137 cuts through the proposed area is noisy and very busy both in the morning and evening with rush hour traffic, cars backing up to nearly Tattingstone and only to increase with the new housing in the area. To the South, Brantham Glebe which does have fine views over the Stour includes the Sewage Works (I have no comment for Vale Farm and East as I do not know that area well.)... Surrounding villages have been granted huge housing developments which will impact on this relatively small, narrow area proposed.</p>	<p>its inclusion facilitated the inclusion of the much larger high quality area to the west. Whilst the transport corridor does fragment the landscape quality of the area, it does not do so to such an extent as to affect the ability of the area as a whole to meet the criterion of natural beauty. The impact of the transport corridor on tranquillity is considered under the theme of Relative Tranquillity below.</p> <p>C) A12 Road The A12 in the far west of the area is well screened visually even in winter, by thick tree and scrub planting which significantly reduces the potential visual impact. Neither the road itself, nor traffic moving on it is visible from most of the proposed extension. Visibility of the A12 within the proposed extension is confined to a few upper valley slopes towards the head of the valley and even here it is largely screened from view by vegetation. Most areas where the road is visible were excluded from the extension and those few which were included (eg the slopes south of Hill Farm) were included due to their importance in the zone of visual influence of the valley, as outlined above. The impact of the A12 on tranquillity is considered under the theme of Relative Tranquillity below.</p> <p>D) Housing There are remarkably few buildings within the proposed boundary along the Samford Valley and the majority have a pleasant vernacular character which adds to the natural beauty of the area. The settlements of Brantham, East End and Bentley have been excluded from the proposed boundary in their entirety, together with neighbouring fields with a flat plateau character, as they were not considered to meet the natural beauty criterion in their own right and did not sit within a sweep of qualifying countryside. The impact of the housing in the existing settlements on the valley landscape was assessed during the site visits to the area in both summer and winter conditions. In line with the Guidance, allocated housing sites or consented developments were excluded from the proposed boundary.</p> <p>The settlements in this area sit on the plateau/plateau edge. Whilst in a few limited places (such as to the rear of Brantham and East End), the rear gardens of the settlement edges back onto the proposed designation boundary, the visual impact of the rooflines and property fences in these areas was assessed as limited in extent and severity, due to adjacent mature vegetation and the complex valley morphology. Village housing on the plateau is not visible from many places from within the valleys of the proposed extension. A group of house roofs at Broom Knoll in East End is visible from the immediately adjacent footpaths descending to the main valley from this settlement. They appear as a group of dull grey roofs which are not visually dominant in the context of the nearby tributary valley, as the eye is drawn to the</p>

<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
		<p>attractive valley morphology to the north, west and east; and not to the settlement edge on the plateau to the south. Their influence is quickly lost on entering the valley.</p> <p>The caravan park and associated development at The Grange (ANON-TK46-6M9W-V) are not a dominant feature in the landscape from the valley, since the site is very well screened by mature vegetation and the interlocking valley slopes. It has a greater impact from the East End Road and adjacent fields which were excluded from the proposed boundary.</p> <p>The influence of Chaplain's and Hill Farms with their small groups of modern farm buildings is not dominating and limited to the area in close proximity. They are not visible from most of the proposed extension. This area was in any case excluded from the proposed boundary as it was not considered to sufficiently meet the natural beauty criterion for a range of reasons.</p> <p>E) Quality of Woodland The woodlands are included as a whole, notwithstanding current management in some areas, since they are County Wildlife Sites and/or ancient woodland sites and it is normal practice and in line with the adopted Guidance to include such features of interest on the edge of a proposed extension. Their largely broadleaved nature also makes a significant contribution to the natural beauty of the area, with seasonal changes in colour and texture adding to the scenic qualities of the area. In addition, the coppice management mentioned provides suitable habitat for the spring woodland flora and other wildlife which contribute to natural beauty.</p> <p>F) 'Horsiculture' The technical assessment noted the area affected by infrastructure associated with the keeping of horses between Dodnash wood and Copey Farm. The area was included within the proposed extension as this steeply sloping area with its extensive mosaic of attractive broadleaved woodland is an intrinsic part of the northern valley slopes of the proposed extension and plays a significant role within the Zone of Visual Influence of the valley, in addition the fencing and other structures affected only a limited area of the valley slopes.</p> <p>G) Arable area at Manor Farm to Alder Carr The area between Manor Farm and Alder Carr (BHLF-TK46-6MMB-U) contains an attractive small tributary valley to the main valley which is topographically interesting, has varied vegetation and is visible from neighbouring Rights of Way, enticing one in towards the main valley. It is also within the zone of visual influence of the main valley and clearly visible from the Rights of Way on the opposite slopes of the valley, forming</p>

<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
		<p>part of the highly scenic, complex patterns of undeveloped valley slopes with varying colours and textures visible from the north side of the valley and the valley floor. Whilst the character of this area is in transition to plateau, landscape and scenic quality remains high.</p> <p>H) Sewage works at Brantham The sewage works at Brantham is, as noted in the technical assessment of the area, well-screened by high mature vegetation and is not considered to be a significant detracting feature in the landscape.</p> <p>Conclusion It is accepted that the transport corridor which crosses the valley at Brantham Bridge is incongruous and fragments the valley physically, but owing to the mitigating factors outlined above it is considered that this does not affect the ability of the valley as a whole to meet the natural beauty criterion.</p> <p>Natural England does not accept that the impact of the other incongruous features described by the five objecting respondents is of a scale or nature as to affect the ability of the proposed extension as a whole to meet the natural beauty criterion as their effect is largely localised and the areas most affected by these features have been excluded from the proposed boundary.</p>
<p>Relative Wildness and Relative Tranquillity</p>	<p>Supporting designation ANON-TK46-6M54-N: It is an idyllic backwater and peaceful haven encompassing North Essex and South Suffolk.</p> <p>ANON-TK46-6M94-S: Existing natural features of ancient woodlands, streams and valleys offer peaceful and tranquil places to walk and enjoy nature. The existing wildlife have relatively unspoilt places to live in safety.</p> <p>ANON-TK46-6M9N-K: It is an unexpected haven of tranquility (sic) with its softly undulating landscape which is so different from the estuary.</p> <p>ANON-TK46-6M9T-S: This a beautiful stretch of secluded countryside which should be protected</p> <p>Objecting to designation ANON-TK46-6M9R-Q: Mark Westward Ltd Response: In summary...</p>	<p>Commentary Natural England considers that the proposed Samford extension as a whole has a strong sense of relative tranquillity. This is supported by comments made by many respondents who clearly value its peace and tranquillity. Three objectors suggested that the area does not have sufficient tranquillity or remoteness. Their rationale is divided into sub-themes as follows:</p> <ul style="list-style-type: none"> A) Lack of Remoteness B) Impact of the A12 Road C) Impact of the A137 and railway at Brantham Bridge D) Impact of the lane crossing the valley at Dodnash Priory E) Future upgrades of major roads F) Impact of air traffic G) Light Pollution <p>A Lack of Remoteness ANON-TK46-6M9R-Q: Mark Westward Ltd and ANON-TK46-6M9W-V comment that the area lacks remoteness. As explained in the Guidance, remoteness is a sub-factor of relative wildness, one of the factors assessed as contributing to natural beauty.</p>

<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<ul style="list-style-type: none"> •The area includes areas that cannot be described as tranquil with almost ceaseless noise from the A12 and the railway line. •The area is in no way remote. <p>BHLF-TK46-6MMB-U: From west to East Hustler’s Grove, Chaplains Farm and Hill Farm –proximity to A12 is far from tranquil, this is a busy road and probably ready for an upgrade... The railway line and the A137 cuts through the proposed area is noisy and very busy both in the morning and evening with rush hour traffic, cars backing up to nearby Tattlingstone and only to increase with the new housing in the area... A12 Upgrade –which will take place in due course possibly to motorway status impacts on noise which can be heard as far as East End.</p> <p>ANON-TK46-6M9W-V: The complete lack of remoteness and tranquillity. The Samford Valley is subjected to ceaseless noise and activity.</p> <p>a. Roads: At the Western end of the proposed extension the A12 is both noisy and visible and carries ever increasing amounts of traffic, particularly freight. The A12 is ceaseless and the intrusive nature of it should not be overlooked or understated. Natural England have also failed to take into account the narrow lanes that in the morning and in the evening, are commuter “rat runs” removing any concept of either remoteness or tranquillity. Sadly whether Natural England like it or not this is a suburban area.</p> <p>b. Rail: The same can be said for the railway but with the added noise produced by the apparent need to hoot loudly at every footpath and crossing at all times of the day.</p> <p>c. Air: The relative proximity to Stanstead Airport does also at times generate a considerable amount of aerial noise. Amateur air traffic is also prevalent.</p> <p>d. Light Pollution: This is an increasing problem as both the Ports of Felixstowe and Harwich are close at hand. Both of these ports are becoming increasingly busy and brighter. The same can be said for Ipswich, Colchester, Manningtree and the A12.</p> <p>The project consultation document then goes on to list special qualities that gives the extension “high landscaping and scenic qualities”. I would add that tranquillity and remoteness do not exist in this area at all.</p> <p>ANON-TK46-6M9W-V: (Additional info supplied to Chairman of Natural England) To the East is the A137 and to the West the A12 both of</p>	<p>Natural England agrees that the area does not have a strong sense of relative wildness as it is in the main, an agricultural area. The level of relative wildness is greater in the more extensive of the semi-natural woodlands, where areas which have not been obviously replanted or have denser undergrowth have a stronger sense of remoteness and a return to nature; as do some areas of dense alder carr and wet marshy areas on the valley floor. An area may have outstanding natural beauty for a range of reasons and as stated in the Guidance; not all factors or sub-factors contributing to natural beauty have to be present in all places. Different parts of a designation can satisfy the natural beauty criterion for different reasons, provided that overall the area is of sufficient natural beauty. In line with many lowland AONBs elsewhere, the fact that the area does not have a strong sense of remoteness in many places does not preclude its designation.</p> <p>B) Impact of the A12 Road</p> <p>ANON-TK46-6M9R-Q, BHLF-TK46-6MMB-U & ANON-TK46-6M9W-V): The technical assessment identified that there was a transition in tranquillity towards the fringes of the Candidate Area along the Samford Valley in the west, in proximity to the A12. The influence of roads depends on the nature of the adjoining landscape, its aspect, slope and prevailing wind direction. Site visits confirmed that the complex valley morphology of the Samford area significantly reduces the levels of road noise within the valleys, even in relatively close proximity. There is a strong sense of relative tranquillity within the valley system as a whole and natural sounds predominate.</p> <p>Road noise increases on some upper valley slopes and on leaving the valley, particularly in the west, adjacent to the A12. This is a well-recognised phenomenon in noise studies and there is a significant contrast in levels of tranquillity between the valley and the surrounding areas of plateau, where the flat open nature of the plateau landscape means that the sound of traffic travels further and affects a significantly wider area in proximity to the A12 road. Areas of flat plateau adjacent to the main roads in the area were left out of the initial Candidate Area as they were not considered to meet the natural beauty criterion for a range of reasons including a lack of relative tranquillity. The worst affected areas within the transition in tranquillity in the west were also left out of the proposed extension when the detailed boundary was chosen. Some additional fields closest to the A12 were also removed from the proposed extension after the informal consultation, where it was felt that there was merit in comments made by some respondents about the impact of road noise in the far west adjacent to the A12.</p> <p>It is considered that the area now included within the proposed boundary excludes the areas worst affected by road noise from the A12. It does however include some areas</p>

<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<p>which are busy, noisy roads. In addition the A12 is visible from many parts of the proposed extension. Adding to the noise are not only the Stanstead aeroplanes but also the main London to Norwich/Felixstowe railway line which runs through the proposed area. The lane from Bentley to East End is an awful rat which can be verified by all of the passing places carved out of my hedges.</p> <p>ANON-TK46-6MDS-3: The proximity to the A12 is already noted as an issue by Natural England in the Boundary Considerations document, and although the boundary has already been re-considered and drawn back from the A12, the road remains a dominating feature which significantly influences the relative tranquillity and relative wildness of the area, even within the adjusted boundary. This again suggests that the boundary should be drawn more conservatively.</p>	<p>in the west where tranquillity is reduced. These were included where other factors contributing to natural beauty are also present, such as valley landform, woodland or patterns of vegetation; or where a more marginal area provided significant views into or across the high quality valley area and these factors were judged to outweigh the reduced tranquillity. For example, a large field immediately south of Hill Farm which lies partly on the plateau and partly on the valley slopes and where tranquillity was noted as reduced was partly included within the boundary. This area was included within the boundary as it lay well within the visual envelope of the valley, was important in views of the valley from the north side, and had a pronounced valley landform. It was also an area with few suitable boundary features, so a pragmatic boundary was selected to include the parts of this field which were an intrinsic part of the valley slopes and exclude flatter areas. It should also be noted that many landscape designations contain or lie adjacent to major motorways and other roads (eg the A66 in the North Pennines AONB and the M4 in the Cotswolds AONB) and this does not preclude designation.</p> <p>C) Impact of the A137 and railway at Brantham Bridge In response to comments about the A137 and the railway at Brantham Bridge (BHLF-TK46-6MMB-U), the technical assessments recognised the reduction in relative tranquillity where the mainline railway and A137 cross the valley in close proximity. Natural England considers however that the limited area where tranquillity is affected by this transport infrastructure does not substantially detract from the natural beauty of the significantly larger proposed Samford Valley extension as a whole. The road and railway cross the proposed extension close together and do not run lengthwise along the valley floor and their influence on relative tranquillity is thus limited in extent and soon lost, owing to the presence of bends in the valley and tall mature vegetation. The majority of the proposed extension is unaffected by these features.</p> <p>The railway crosses the valley on an embankment which effectively reduces road noise from the A137 in the part of the valley lying west of the railway. Noise from trains is fairly frequent (around 6 passenger trains per hour on a weekday) but does not travel far due to the valley morphology and is intermittent and transient in nature. It is not considered to be a significant detractor overall, though the sounding of horns as trains approach the footpath crossing in the valley is momentarily intrusive. This finding is consistent with other landscape designations, many of which contain mainline railway lines.</p> <p>The A137 has an effect on relative tranquillity in close proximity on the valley floor and the valley slopes immediately to the east (and to the west, for the very short stretch of valley between the road and the railway embankment). It is however effectively</p>

<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
		<p>screened by thick vegetation and the winding valley morphology again limits the extent of its influence on relative tranquillity to a relatively short stretch of the valley.</p> <p>D) Impact of the lane crossing the valley at Dodnash Priory. Only one narrow lane crosses the valley west of Brantham Bridge, which limits the sources of road noise within the valley significantly. Regarding the impact of traffic on this lane, which crosses the area adjacent to Dodnash Priory, it is accepted that at certain times of day this is subject to heavier traffic. Site visits were carried out on several occasions and at different times of day. During the site visits the degree of use was not seen to be such that it had a significant influence on the ability of the area as a whole to meet the natural beauty criterion. Levels of relative tranquillity within the valley were found to be significantly higher overall than on the surrounding plateau areas. The lanes around the valley system were also noted to be quiet for most of the day. This finding was reinforced by the latest CPRE tranquillity mapping of this area.</p> <p>E) Future upgrades of major roads BHLF-TK46-6MMB-U: In relation to the potential upgrade of the A12 and future increases in road and rail use, the legislation related to AONB designation requires that land to be designated, "is of such outstanding natural beauty" that its designation is desirable. It has been established during previous public inquiries in relation to designated landscapes that the use of the present tense in the wording of the legislation means that the assessment can only take into account the current condition of the area at the time of the assessment of natural beauty. It cannot take account of either opportunities to enhance its natural beauty or potential future threats against it, unless these are at a stage of development that means that they will definitely happen. At the time of the assessment, no plans for an upgrade of the A12 in this area were under active consideration.</p> <p>F) Impact of air traffic Some noise from a few large planes at high altitude and occasional light aircraft at lower altitudes was noted during site visits, but air traffic was not considered to be a significant detractor from relative tranquillity in the proposed extensions. Arrival and departure mapping and data published for Stanstead airport show that very few departures overfly the proposed extension. Some arriving aircraft do overfly the area, though most fly further to the north, but all are at altitudes of greater than 6,000ft above mean sea level when they cross it. Noise mapping for Stanstead does not extend out as far as the proposed extensions as they are not considered to be significantly affected by its air traffic.</p> <p>G) Light Pollution</p>

<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
		<p>In relation to light pollution, the area of the Samford Valley is noticeably darker at night than the places mentioned by ANON-TK46-6M9W-V: ie the ports of Harwich and Felixstowe as well as towns such as Ipswich etc. The area contains no settlements and only a few scattered farm houses. The valley floor and woodlands provide some particularly dark areas where few artificial light sources can be seen. CPRE dark skies mapping confirms that nearly all land in the proposed Samford extension falls within the 2nd and 3rd darkest bands out of a scale of 9 bands, the only exception being a small area north of East End which lies in the 4th band, reflecting the impact of street lighting in the village on the surrounding area. The area is thus significantly darker than areas within the existing SC&H AONB east of Harkstead and of a similar level to areas west of the Royal Hospital School within the existing AONB.</p> <p><u>Conclusion</u> Natural England remains of the view that the areas included within the proposed Samford extension as a whole have sufficient relative tranquillity to warrant designation. Where tranquillity is reduced locally in some places, due to the proximity of transport infrastructure, this has been recognised in the assessments and taken account of in the setting of the boundary by the exclusion of the majority of such areas. Where such areas of lesser tranquillity have been included, the overall assessment of factors which contribute to NB demonstrated that there is a weight of evidence to support designation.</p>
Natural Heritage Features	<p><u>Supporting designation</u> ANON-TK46-6MK6-D: I am glad to see that Dodnash Wood and Great Martin's Hill Wood at Bentley in Suffolk are within the proposed extension. These provide valuable habitat: over the years I have seen several deer species there, as well as buzzards.</p> <p>ANON-TK46-6MD2-2: While the AONB is on different grounds to an SSSI, the wildlife interest of the area is considerable and the preservation of its beauty and of its wildlife will tend to work together.</p> <p>ANON-TK46-6M96-U: Certainly, this area lies at the heart of the Dodnash SLA and has very special and historic qualities. Ancient woodlands are of great interest and importance.</p> <p><u>Objecting to designation</u> None</p>	<p><u>Commentary</u> Natural England considers that the natural heritage features and habitats of the area mentioned by several respondents contribute to the natural beauty of the area as described in the technical assessment of natural beauty. The presence in this area of complex patterns of multiple habitat types including woodland, grassland, water and arable land as well as varying aspect ensures that the area, offers many 'edge habitats', known to maximise the diversity of flora and fauna in an area. This is reflected in the significant levels of wildlife recorded in the area and the many rare species noted.</p> <p><u>Conclusion</u> Natural England considers that the natural heritage features found within the area including the natural sights and sounds of the many different bird species, varied habitats, seasonal blossom, woodland flora and the brooks all make a significant contribution to the high levels of natural beauty present in the Samford Valley area.</p>

<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
<p>Contribution of farming to natural beauty</p>	<p><u>Supporting designation</u> None</p> <p><u>Objecting to designation</u> ANON-TK46-6M9W-V: Natural England's reasons for including the Samford Valley and also the other proposed extensions appear to be very shallow and largely reliant upon the continued goodwill and management practices of existing land managers.</p> <p>ANON-TK46-6M9W-V: The woods, hedges, irregular- shaped meadows and wet pasture are only as they are because land managers and landowners, often very recently, have reverted arable land back to grass, planted hedges, replanted woods etc. Without the support of landowners etc. these "improvements" are at risk of being undone or no longer managed. If landowners consider that, by being forcibly designated, they are being punished for being good land managers then I fear, environmentally, for any AONB extension.</p> <p>ANON-TK46-6MW-V: (Additional information supplied in emails to Natural England's Chairman): To be honest I slightly feel that we are very much being punished by Natural England for managing our land sympathetically. My family have looked after the farm for five generations and during that time have planted acres and acres of woodland and then replanted them after the gale, planted miles of hedging and latterly have reverted a considerable amount of arable land to grassland.</p> <p>ANON-TK46-6M9R-Q Mark Westward Ltd Response: The natural beauty has only recently been brought about in the last decade by the farmer reverting all the arable fields in the bottom of the valley back to grassland, forming a pattern of irregular shaped meadows and wet pastures, with broad hedgerows but still with overhead electricity pylons running across it. A significant part of the proposed extension is not very attractive arable land. A very small part of the proposal has natural beauty.</p>	<p><u>Commentary</u> Sub-themes in this section cover:</p> <ul style="list-style-type: none"> • A) Land management and natural beauty • B) The natural beauty of the area is of recent origin and man-made • C) Recognition of good stewardship <p>A) Land management and natural beauty Natural England agrees with the observation that the landscape of the area is strongly influenced by agriculture and woodland management as well as other aspects of land management and that these have given rise to, and continue to maintain many aspects of its natural beauty, however other factors are also relevant in the assessment of natural beauty. These other factors are reflected in our technical assessment of the area. The recent improvements and sensitive management of land in the proposed Samford Extension were noted in the assessments of the area and the positive impact of this management on the natural beauty of the area acknowledged.</p> <p>All the areas within the proposed extensions have been thoroughly evaluated against the adopted and published Guidance. The technical assessments and rationale for designation of the Samford Valley were written up in detail. The evaluation approach used by the project team was quality assured by Natural England's Chief Scientist prior to the September 2017 Board meeting which approved the technical assessments. The assurance process tested the use of our guidance, precedent, published evidence and field evidence which were used as a basis for the recommendation to Natural England's Board on the proposed changes to SC&H AONB boundary.</p> <p>B) The natural beauty of the area is of recent origin and man-made ANON-TK46-6M9R-Q and ANON-TK46-6M9W-V suggest that aspects of the natural beauty of the area have a recent origin. Landscape features, patterns and different land use can make a significant positive contribution to natural beauty, whether or not they are of recent origin, but they are not the only features which do so. In combination with the complex, winding and sometimes relatively steep geomorphology of this valley system, features restored and/or land use patterns created by land managers, can give rise to natural beauty.</p> <p>In relation to the comment that the natural beauty of the area is man-made, it was clarified in the NERC Act 2006 that land used for agriculture or woodlands, used as a park, or an area whose flora, fauna or physiographical features are partly the produce</p>

<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
		<p>of human intervention in the landscape can still have natural beauty and may be included in landscape designations.</p> <p>C) Recognition of good stewardship ANON-TK46-6MW-V: Rather than being seen as a ‘punishment’ for having looked after land sympathetically over generations, Natural England considers that AONB designation can be seen as a recognition of the role of good stewardship of the land when considering natural beauty.</p> <p>It is understood from their broader responses that the five respondents who object to the designation of this area also have concerns about the potential impact of designation on agricultural operations and the ability to run viable businesses and develop land. These issues are addressed further in the separate analysis of representations relating to the desirability of designation.</p> <p><u>Conclusion</u> Natural England agrees that agriculture and woodland management has given rise to and continues to maintain many aspects of the area’s natural beauty though not all, and will hopefully continue to play an important role in the future.</p>

Conclusion

The consultation demonstrated a clear level of consensus, including from statutory consultees that the proposed Samford Valley Extension Area has sufficient natural beauty to warrant designation as an Area of Outstanding Natural Beauty. Natural England welcomes the fact that many consultees gave reasons for their views, which were mostly in agreement with the Natural Beauty Assessment which Natural England undertook of the area. Five respondents including the CLA, disagreed that the area had sufficient natural beauty and supplied reasons as to why they felt that the area did not have sufficient natural beauty. These reasons have been considered in detail and concentrated on the method used, character and quality comparisons with land in the SC&H or Dedham Vale AONB, the presence of incongruous features in the area, and lack of tranquillity or remoteness.

Natural England has re-visited the natural beauty assessment for the area and undertaken further site visits since the statutory consultation. It is considered that the points raised by the objectors to this proposed extension were identified and adequately assessed within the existing technical documentation and that the overall findings in relation to this area were sound. It also considers that the method used was robust, followed the approved Guidance and was sufficiently well documented.

Natural England remains of the view that the area as a whole has sufficient natural beauty to fulfil the statutory designation criterion for designation as AONB. Comments made in relation to specific elements of the boundary of this extension, including by statutory consultees are considered further in the boundary considerations tables, including comments about the natural beauty of additional areas proposed for inclusion in the proposed extensions. Natural England agrees with the overwhelming proportion of respondents who expressed the view that the proposed Samford Valley Extension has sufficient natural beauty to meet the designation criterion of outstanding natural beauty.

4.5 Analysis of Qualitative Responses re. Natural Beauty of the Proposed Freston Brook Extension

Response Form Question C11: Does this area have sufficient natural beauty to be designated as AONB?	
Yes	72
No	2

Summary Analysis of Responses

A large majority (97%) of respondents who responded to question C11 agreed that the proposed Freston Brook Extension has sufficient natural beauty to warrant designation as AONB. Only two people stated that the area did not meet the natural beauty criterion and they did not supply detailed evidence in support of this view. There was however a mistake in the printing of the hard copy forms which meant that the tick boxes for this question were missing. Some people had put their answers to C11 into the additional information box and these were added to the online responses in the quantitative analysis figures above. The consensus in email and letter responses was also in favour of designation, with no objections received in these formats.

Four of the seven statutory local authority consultees indicated their general support for the designation of the proposed extensions including the Freston Brook extension, but without supplying any detailed information about their views on the detailed technical assessment of natural beauty for this area.

The SC&H AONB and Dedham Vale AONB Partnerships both welcomed the proposals to extend the boundary of the AONB and indicated their support for the designation of the areas included within the proposals. Neither Partnership provided detailed comments on the technical assessment of natural beauty for the proposed Freston Brook extension.

Few respondents gave detailed reasons for their views in relation to the natural beauty of this area. All responses were however analysed and a number of common themes emerged. Each theme is considered further in the table below with relevant text from responses extracted verbatim under the relevant theme heading.

Responses from statutory consultees, companies or other organisations have been attributed to them, the remainder are anonymised. A Natural England commentary is provided for each theme raised in relation to this proposed extension, together with a concluding paragraph regarding whether the evidence submitted in relation to each theme affects our assessment of the natural beauty of the area and the case for whether or not the area warrants designation.

<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
Statutory Authority and AONB Partnership Responses in relation to the	BHLF-TK46-6M99-X: Babergh & Mid Suffolk District Council: The Council welcomes the proposal to extend the boundary of the AONB southwards towards Essex and the inclusion of areas within Babergh.	Four of the seven statutory consultees responded positively at a generic level to the proposals to extend the boundary of the AONB, including along the Freston Valley. These general statements of support for the principle of their designation can be taken to demonstrate implicit agreement that the areas have sufficient natural beauty to warrant designation by the fact that they support the proposals, though they do not specifically state this. Although Tendring District Council did submit a

<p>Natural Beauty of the proposed Freston Brook Extension</p>	<p>BHLF-TK46-6MME-X: Suffolk County Council: Suffolk County Council: Suffolk County Council welcomes Natural England's proposals to extend the boundaries of the SC&H AONB... The extension of the AONB is a once in a generation opportunity to ensure that the Suffolk Coast & Heaths includes all those areas that are worthy of designation.</p> <p>BHLF-TK46-6MDN-X: Ipswich Borough Council: The Council broadly supports proposals to extend the AONB into the candidate areas and thereby to support the conservation of the area's natural beauty.</p> <p>BHLF-TK46-6MMP-9: Essex County Council strongly supports Natural England's (NE) proposal to extend the boundaries of the SCH AONB in the areas outlined in the consultation.</p> <p>BHLF-TK46-6M9D-9: Suffolk Coast and Heaths AONB Partnership: In summary the Suffolk Coast and Heaths AONB Partnership response is:</p> <ul style="list-style-type: none"> • To welcome the proposals to extend the current boundary of the AONB <p>BHLF-TK46-6M92-Q: The Dedham Vale AONB and Stour Valley Partnership: The Dedham Vale AONB and Stour Valley Partnership Response is to welcome the proposals to extend the current boundary of the AONB.</p>	<p>response, it did not comment on whether it supported the proposals or not; confining its remarks to specific parts of the boundary on the South Side of the Stour in Essex only.</p> <p>None of the statutory consultees or the AONB Partnerships provided detailed comments on the natural beauty of the areas within the proposed extensions, confining their detailed comments to the additional areas which they wished to see included within the proposed Samford and Stour Extensions.</p>
<p>Landscape and Scenic Quality, including comparisons with other AONBs</p>	<p>Supporting designation</p> <p>ANON-TK46-6M53-M: This area is similar to that already covered by the existing AONB and well worthy of inclusion. The woodlands have not been effectively managed to retain this beauty.</p> <p>BHLF-TK46-6MZR-R: This is a tongue of land following the Freston Brook. An ideal extension to the Orwell AONB.</p> <p>BHLF-TK46-6MM9-J: Yes it is a natural extension from the current ANOB and should be protected.</p> <p>ANON-TK46-6MDZ-A: Rare steep slopes and a matrix of ancient woodland, arable and pasture.</p> <p>ANON-TK46-6MMH-1: I support this extension for the many of the same reasons as the Samford Valley above. Analyst's note: respondent's rationale for Samford Valley reproduced here: "The valley and its watercourse are typical of the smaller side valleys</p>	<p>Commentary</p> <p>Many non-statutory respondents supplied generic comments to support their view that the area has sufficient natural beauty to warrant designation but without giving a great deal of detail. Natural England agrees with the respondents who commented on the intimate nature of the river valley, its interesting topography and other individual features that contribute to the high levels of landscape and scenic quality and visual interest in this area. The comments made by these supportive respondents are in line with the information and conclusions in the Natural England technical assessments.</p> <p>In addition to the generic comments, a number of respondents made comments about the character and/or quality of the area or whether there were similarities with land in the neighbouring AONB. To aid clarity in the Natural England commentary, a range of sub-themes raised in the responses have been identified and each is considered separately. The sub-themes are:</p> <ul style="list-style-type: none"> • A) Character comparison with existing AONB • B) Scenic quality • C) Range of attractive features

	<p>that feed into the main Stour Valley. Their high landscape quality comes from a combination of habitat diversity, intimacy and relative tranquillity”.</p> <p>ANON-TK46-6M9T-S: This a small and intimate area of landscape which is finely wooded and makes an appropriate extension of the AONB... This is a small and beautiful area of landscape.</p> <p>ANON-TK46-6M96-U: Ancient landscape preserved in remarkably original condition... Long personal association with the area and appreciation of its beauty as a valley and woodland landscape.</p> <p>ANON-TK46-6MK6-D: It contains visually valuable woodland</p> <p>ANON-TK46-6M5D-5: Beautiful old woodland</p> <p>BHLF-TK46-6MZR-R: -this is a lovely wooded area.</p> <p>ANON-TK46-6M93-R: Fairly unspoilt with the Brook providing interest down to the Orwell.</p> <p>ANON-TK46-6MB9-7: another very beautiful unspoilt area</p> <p>ANON-TK46-6MDZ-A: Self evident when on site.</p> <p>ANON-TK46-6MDW-7: The River Orwell has been compared by sailors to the River Dart and judged by them to be more beautiful! There are few more beautiful areas in the United Kingdom than that incorporating the Orwell, especially its middle reaches, so it is incumbent upon landlubbers to do all they can to support and enhance the claim!</p> <p>ANON-TK46-6MB6-4: The area meets the criteria identified by Suffolk Coasts and Heaths as appropriate for an AONB.</p> <p>ANON-TK46-6MDT-4: The proposed expansion would help to achieve that by including areas that unambiguously deserve such protection.</p> <p>ANON-TK46-6MKV-D: It is stunning and deserves to be incorporated.</p> <p>ANON-TK46-6MBV-4: Its obvious good scenery.</p> <p>ANON-TK46-6MBW-5: It is outstandingly naturally beautiful.</p>	<ul style="list-style-type: none"> • D) Unspoilt area • E) Holbrook Park and Cutlers Wood <p>A) Character comparison with existing AONB Natural England agrees with respondent (ANON-TK46-6M53-M), who suggested that the character of the proposed Freston Extension is similar to areas in the existing AONB. In its assessment Natural England noted the degree to which the area shares the character and quality of the typical short tributary river valley structure of the small streams flowing into the Orwell within the existing AONB, and differs from the adjacent flat plateau landscapes, together with the recognition that it shares many typical characteristics of the tributary valleys of the Orwell river system of which it is a part.</p> <p>It was however established during the South Downs Public Inquiries that the test for inclusion of land within a National Park or ANB is not comparison with other nationally designated areas or adjacent areas, but against wider ordinary countryside. Character alone is not a valid reason for including or excluding land; the natural beauty criterion does not require ‘characteristic’ natural beauty. This sub-theme is elaborated on further in the analysis of the Samford Valley Extension Responses.</p> <p>B) Scenic quality Natural England agrees with the respondents (eg ANON-TK46-6MK6-D) who commented on the scenic qualities of the Freston Brook Extension Area as being a major contributor to the level of natural beauty in the area. The high quality of the views across and within the area were described in the detailed technical assessment of natural beauty.</p> <p>C) Range of attractive features Natural England agrees that many of the examples of landscape features provided by respondents (eg ANON-TK46-6MDZ-A) contribute to the high level of landscape and scenic quality in the area. These individual features and the patchwork of textures and colours they provide were elaborated upon in the technical assessment of the area, including the intimate nature of the short, shallow valleys, small irregular pastures, streams and wet meadows, estate parkland and more extensive, fine woodlands. In particular, Natural England agrees with the respondents who commented on the landform of the Freston area as being a major contributor to the level of natural beauty in the area. The classic interlocking valley morphology and relatively steep slopes were also described in the assessment of natural beauty.</p> <p>D) Unspoilt area Natural England agrees with respondents who state that the area is largely unspoilt (eg ANON-TK46-6MB9-7). Site visits confirmed that its landscape features are generally in good condition and that the area has largely been managed in a sensitive fashion, with many traditional features typical of the area retained, such as</p>
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	<p>ANON-TK46-6MM4-D: Beautiful natural valley and landscape</p> <p>ANON-TK46-6MBW-5: It's beautiful...Vital area of wonder.</p> <p><u>Objecting to designation</u> None</p> <p><u>Other</u> BHLF-TK46-6MMX-H: We welcome the inclusion of the valley area in the AONB but question whether the Holbrook Park or Cutlers woodland should be included. It is not clear that these areas of woodland reflect the special qualities and characteristics of the rest of the AONB. Furthermore their inclusion requires the strip of plateau farmland to the south of Valley Farm being included in the designation which may not adequately meet the criteria.</p>	<p>permanent pasture, estate parkland, deciduous woodland, hedges, springs and meandering streams.</p> <p>E) Holbrook Park and Cutlers Wood The woodland at Holbrook Park and Cutlers Wood was considered in detail during the assessment process, as detailed in the technical assessment. In summary the inclusion of these areas was considered to be warranted for a range of reasons. These included the role of the woodland in framing the head of the valleys in the proposed extension, the fact that the head of one of the tributary valleys lies in the field between the two woods, their role in proving a sense of enclosure around the valleys and their contribution to the wooded estate feel of the proposed extension. In addition both woods are part of an extensive woodland SSSI which is already partly within the AONB, forming one of the largest remaining areas of ancient woodland in Suffolk and have significant biodiversity value, being carpeted with spring flowers, providing a seasonal display of colour. Holbrook Park is also a rare surviving mediaeval deer park with many traditional management features still visible and it contains some of the largest coppice stools in the country, reminders of past woodland industries.</p> <p>The presence of some areas of lower landscape quality where replanting had taken place in the woods and the largely plateau character of the field between the woods was noted during the assessments but it was felt that the positive factors outlined above outweighed the localised detracting elements, which were not felt to undermine the ability of the proposed extension area as a whole to meet the natural beauty criterion.</p> <p>The inclusion of Holbrook Park and Cutlers Wood was reviewed in light of two representations after both the informal consultation and the statutory consultation. Natural England remains of the view that their inclusion is warranted for the reasons given above.</p> <p>Response to representations Natural England agrees with representations that the inclusion of the proposed Freston Brook Extension will enhance the existing AONB through the inclusion of additional, immediately adjacent qualifying land containing a range of features which contribute to a high level of natural beauty. The area is considered well worthy of inclusion, particularly in the context of the AONB as a whole.</p>
Tranquillity	<p><u>Supporting designation</u> ANON-TK46-6M94-S: It offers relative tranquillity (sic) at present and excellent views across fields and valleys. A haven for walkers and wildlife enthusiasts.</p> <p>ANON-TK46-6MB6-4: The area is enjoyed by local people for it's tranquillity and natural features.</p>	<p>Commentary Natural England agrees with respondents who commented on the high levels of relative tranquillity present in the area.</p> <p>Response to representations Natural England agrees that the area's high level of relative tranquillity contributes to its natural beauty.</p>

	<p>ANON-TK46-6MMH-1: I support this extension for the many of the same reasons as the Samford Valley above. {Analyst's note: respondent's rationale for Samford Valley reproduced here: The valley and its watercourse are typical of the smaller side valleys that feed into the main Stour Valley. Their high landscape quality comes from a combination of habitat diversity, intimacy and relative tranquillity}.</p> <p>ANON-TK46-6MMU-E: Quiet, tranquil area covering a variety of landscapes</p> <p><u>Objecting to designation</u> None</p>	
<p>Natural heritage features: specific examples</p>	<p><u>Supporting designation</u> ANON-TK46-6M5D-5: Beautiful old woodland with amazing bluebells in the Spring and home to native red deer.</p> <p>BHLF-TK46-6MDX-8: There is a significant wildlife population in this area.</p> <p>ANON-TK46-6M9H-D: Ancient estate woodlands and glorious valley leading to the river Orwell filled with bluebells and wild garlic in Spring.</p> <p>ANON-TK46-6MB6-4: There are beautiful unspoilt natural ancient woodlands on this site.</p> <p><u>Objecting to designation</u> None</p> <p><u>Other</u> None</p>	<p>Commentary Natural England agrees that the natural heritage features referred to by respondents contribute to the natural beauty of this area and consider that the specific examples supplied give strength to this view, particularly in relation to the flora and fauna of the SSSI woodlands at Holbrook Park and Cutlers Wood.</p> <p>Response to representations Natural England agrees that the area's natural heritage features contribute to the natural beauty of the area.</p>
<p>Cultural heritage features: specific examples</p>	<p><u>Supporting designation</u> ANON-TK46-6M96-U: Long personal association with the area and appreciation of its beauty as a valley and woodland landscape, coupled with ancient Holbrook Park, a surviving medieval deer park.</p> <p>ANON-TK46-6MB6-4: There are other significant archaeological features nearby such as the Freston Enclosure. This is a scheduled ancient monument.</p> <p><u>Objecting to designation</u> None</p>	<p>Commentary Natural England agrees that Holbrook Park is a significant feature of cultural heritage interest and its physical features add significant interest to the area. The mediaeval deer park with its surviving boundary banks, veteran boundary pollards and huge hazel stools, demonstrating past woodland management practices is a rare cultural heritage feature. Whilst its current management has altered the nature of the woodland in places, and it lies on the edge of the proposed extension outside the valley rim on the neighbouring plateau, its inclusion within the proposed boundary is in line with the Guidance and it has been included together with Cutlers Wood as a feature of interest on the margin of a qualifying area.</p> <p>The Scheduled interrupted ditch system at Potash Farm lies further to the south, outside the proposed extension within an area of typical plateau landscape which</p>

	<p><u>Other</u> None</p>	<p>was assessed as not meeting the natural beauty criterion. Since it was not within the qualifying area it was excluded from the proposed extension.</p> <p>Response to representations Natural England agrees that the mediaeval deer park at Holbrook Park adds cultural heritage interest to the natural beauty of the area.</p>
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Conclusions

The consultation demonstrated a clear level of local consensus that the proposed Freston Brook Extension Area has sufficient natural beauty to warrant designation as AONB. Natural England considers that many of the reasons given are consistent with those stated in the Natural Beauty Assessment for the Freston Brook area. Only two respondents disagreed that the area had sufficient natural beauty to warrant designation, but only one supplied a reason. The natural beauty of Holbrook Park and Cutlers Wood was further considered and Natural England remains of the view that its inclusion is warranted. Natural England agrees with the overwhelming proportion of respondents who expressed the view that the proposed Freston Brook Extension has sufficient natural beauty to meet the designation criterion of outstanding natural beauty.

4.6 Analysis of Qualitative Responses re. Desirability of designation for the purpose of conserving and enhancing natural beauty Summary

Question Responses	Is it desirable to designate this area as AONB due to its natural beauty?		
	Yes	No	Not Sure
C3: Proposed Stour estuary extension	89% (101)	4% (5)	4% (4)
C8: Proposed Samford Valley Extension	58% (65)	4% (5)	14% (16)
C13: Proposed Freston Brook Extension	58% (65)	1% (1)	-

Summary of Responses

A large majority of respondents (89%) who used the response form provided for Question C3 agreed it was desirable to designate the Stour Estuary extension. 58% of the respondents who used the response form for Questions C8 (Samford Valley extension) and C13 (Freston Brook Extension) also agreed it was desirable to designate these areas. Thirteen respondents submitted their response by letter or email rather than on the form. It was thus not possible to include their responses in the numeric summary Table, as they did not actually answer these questions, so the figures shown appear lower than the actual response rates shown. The consensus in virtually all the 'non-questionnaire' responses was significantly in favour of designation, with just one objection to the proposed Stour estuary extension (from a housing developer).

Five of the seven statutory consultees who responded to the consultation indicated their general support for the designation of all three proposed extensions. In doing so, however, they did not use the response form and therefore did not specifically respond to this question. However from their responses it can reasonably be inferred that they consider that it is desirable to designate all three proposed extensions. All five statutory consultees also proposed the inclusion of further areas beyond those proposed by Natural England and their further proposals are considered in the boundary consideration analysis Tables.

The SC&H and Dedham Vale AONB Partnerships also welcomed the proposals to extend the current boundary of the AONB and indicated their support for the designation of the areas included within the proposals but again without addressing the specific question of the desirability of designation. They too requested the inclusion of additional areas and these are considered in the boundary Tables. The remaining responses answering positively to this question for each proposed extension were either from amenity and other groups (eg the Stour and Orwell Society, the Harwich Society and the Lawford Scout Group), or from members of the public.

Three of the five objectors to the proposed Stour Estuary extension, identified themselves as landowners/ farmers and were from the same farming business (BI and JE Mitchell and Sons); as did three of the five negative responses to the desirability of designating the proposed Samford Valley extension. The Country Land and Business Association (CLA) also responded negatively to the desirability of designating both the Stour estuary and Samford Valley proposed extensions, reflecting the opinions of its objecting members, but did not address this question with regard to the proposed Freston Brook extension.

The majority of responses provided reasons for their opinions, though these were mostly outline in nature and not supported with significant evidence. Each response has been allocated to themes and recorded and commented upon in the Tables below.

4.7 Analysis of Qualitative Responses re. Desirability of Designation: Significance of the Area

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
<p>Consensus</p>	<p><u>Desirability of designation of all three proposed extensions</u></p> <p><u>BHLF-TK46-6MME-X</u> Suffolk County Council welcomes Natural England’s proposals to extend the boundaries of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty, but it considers that the proposal should be amended prior to the preparation of the Draft Designation Order as described in the appendix to this letter (analyst’s note: these proposed amendments are considered in the ‘Boundary Tables’).</p> <p>The AONB designation respects and celebrates how people have shaped these landscapes over many years and seeks to ensure that future generations can enjoy these outstanding landscapes and the natural and historic features contained within them, including the wildlife that we know is under threat.</p> <p><u>BHLF-TK46-6MMP-9</u> Essex County Council: The inclusion of new areas which have been identified as being of AONB quality, into the SCH AONB are welcomed as they will bring new opportunities for conserving and enhancing the natural beauty of landscapes in Essex (as well as Suffolk). There is also the potential for there to be related economic and employment benefits within the extended areas.</p> <p><u>BHLF-TK46-6M99-X</u>: Babergh & Mid Suffolk District Council: The Council welcomes the proposal to extend the boundary of the AONB southwards towards Essex and the inclusion of areas with Babergh.</p> <p><u>BHLF-TK46-6MDN-X</u>: Ipswich Borough Council: The Council broadly supports proposals to extend the AONB into the candidate areas and thereby to support the conservation of the area’s natural beauty.</p> <p><u>BHLF-TK46-6M9K-G</u> Tendring District Council {<i>analyst’s note: although this response does not overtly state this local authority’s general support, it is apparent from the response that Tendring DC are supportive of an extension</i></p>	<p><u>Commentary</u></p> <p>The responses received have been divided into the following subthemes:</p> <p>Desirability of designation of all three proposed extensions Desirability of designation of the proposed Stour Estuary extension Desirability of designation of the proposed Samford Valley and Freston Brook extensions</p> <p><u>Desirability of designation of all three proposed extensions</u></p> <p>The Natural England Guidance document states that “views of stakeholders and the public can be strong indicators as to whether there is consensus about the value of a landscape”.</p> <p>Overarching opinions with regard to consensus and the desirability of designation can be ascertained from general statements made in response to the consultation either supporting or objecting to the proposed extension to the SC&H AONB. These can reasonably be taken as ‘proxy’ responses to the more specific question regarding the desirability of designation to meet the statutory purpose of the AONB designation.</p> <p>It is apparent from the statutory and public consultation that the statutory local authority consultees; the SC&H and Dedham Vale AONB Partnerships and the great majority of other consultees share a widespread consensus that it is desirable to designate each of the proposed extensions. Responses from the statutory consultees, however, tended to focus on promoting further areas for designation beyond those being proposed by NE, rather than on specific issues related to the desirability of designation of the proposed extensions. This approach is notably the case with regard to Tendring District Council’s response to the consultation.</p> <p>Opposition to the proposed extensions and specifically disagreement regarding consensus was almost entirely from a small number of landowners/</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p><i>to the SC&H AONB within the district albeit with a desire for further additions. This is as explained in the adjacent 'Comments' column.</i></p> <p><u>BHLF-TK46-6M9D-9</u> {SC&H AONB Partnership¹} The potential inclusion of new areas into the Suffolk Coast & Heaths AONB will bring new opportunities for conserving and enhancing the natural beauty of landscapes in Suffolk and Essex that have been identified as being of AONB quality and such a designation would be desirable.</p> <p>The Partnership notes that these additional areas could benefit from the designation in terms of conserving and enhancing natural beauty and having the added benefit of supporting a tourism industry with related economic and employment benefits.</p> <p>The Suffolk Coast & Heaths AONB Partnership consider the boundary review to be a terrific opportunity to conserve and enhance additional landscapes of Essex and Suffolk that meet the designation criteria.</p> <p><u>BHLF-TK46-6M92-Q</u> {The Dedham Vale AONB and Stour Valley Partnership}: To welcome the proposals to extend the current boundary of the AONB.....The potential inclusion of new areas into the Suffolk Coast & Heaths AONB will bring new opportunities for conserving and enhancing the natural beauty of landscapes in Suffolk and Essex. It is noted that these areas have been identified as being of AONB quality and such a designation would be desirable.</p> <p><u>BHLF-TK46-6MMX-H</u>: {The Suffolk Preservation Society (SPS)} Our comments to the consultation are limited to the extensions which impact on the landscape of Suffolk and therefore we will not comment on the proposed extension to the south of the Stour estuary in Essex. Overall SPS welcomes the proposed extension of the AONB designated area which will extend the</p>	<p>farmers (supported by the CLA and a land agent) and tended to be with regard to their own landholdings and to be on the basis that designation is unnecessary given the existing management already in place; that there will be increased bureaucracy and regulation, and that Permitted Development Rights will be withdrawn. We have addressed each of these concerns elsewhere in this report.</p> <p><u>Desirability of designation of the proposed Stour Estuary extension</u></p> <p><u>BHLF-TK46-6M9K-G</u> Tendring DC: This response does not overtly state this local authority's general support, or provide specific comments with regard to the desirability of designation, but does express a desire for further additions beyond those proposed by Natural England. Further evidence of this support is that the draft 'Tendring District Local Plan 2013-2033 and Beyond' as submitted for Public Examination in October 2017, states that "The southern shore of the Stour Estuary is recognised locally for its landscape qualities and the Council supports its inclusion within the proposed extension to the Suffolk Coast and Heaths AONB" (para 7.3.4).</p> <p>The strong desire on the part of Tendring DC and Essex CC (<u>BHLF-TK46-6MMP-9</u>) for the SC&H AONB to include land on the south side of the Stour estuary has been reflected in local plans and in the Essex Structure Plan over many years. It is to be noted however that the area indicated in the Tendring Local Plan as a proposed extension to the AONB is not identical to the area managed as part of the Additional Project Area by the AONB and nor is it identical to the area proposed for inclusion in Tendring DC's response to Natural England's statutory and public consultation. These differences are perhaps explained by the relative complexity of identifying a specific boundary, particularly in the vicinity of Mistley and Manningtree. The great majority of general responses from others, including both the SC&H & Dedham Vale AONB Partnerships, are supportive the principle of</p>

¹ It is important to note that the SC&H AONB Partnership response does not reflect the opinions of the CLA (& NFU?) which submitted a separate response on behalf of its members. Natural England also exempted itself as a signatory of this response.

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>degree of protection afforded to scenic landscapes of the county and offers an opportunity to conserve and enhance the additional areas.</p> <p><u>ANON-TK46-6MKV-D</u> Society will undoubtedly benefit in the long term by expanding the AONB as proposed.</p> <p><u>ANON-TK46-6MB6-4</u> I hope that this consultation and set of proposals are successful to protect and enhance the landscape for future generations. Thank you.</p> <p><u>ANON-TK46-6M9X-W</u> Pleased to see the continued expansion of AONBs.</p> <p><u>BHLF-TK46-6MBN-V</u> Having been and seen all documents, I support the A.O.N.B. extensions to all 3 areas</p> <p><u>BHLF-TK46-6MBK-S</u> I approve of all three extensions to the A.O.N.E (sic)</p> <p><u>ANON-TK46-6MBY-7</u> The Stour and Orwell Society was set up some 11 years ago with the sole purpose of working towards preserving and enhancing the Stour and Orwell AONB. The Suffolk Coast & Heaths AONB Partnership has had an ambition for a boundary review for over 20 years and we as a Society of some 250 members welcomes the boundary review that Natural England are undertaking.</p> <p><u>Objecting to the Desirability of designation of all three proposed extensions</u></p> <p><u>ANON-TK46-6MD6-6:</u> Personally I think it is a lovely area and alongside many others I enjoy the area a great deal, however I think this process is a waste of resources.</p> <p><u>Supporting designation: with specific regard to the desirability of designation of the proposed Stour estuary extension</u></p> <p><u>BHLF-TK46-6MDX-8</u> Although some other areas may have been considered as desirable, I was happy that they had been considered and accept the reasons they have not been included.</p> <p><u>ANON-TK46-6MZX-X</u> Make it so!</p> <p><u>ANON-TK46-6M53-M:</u> It embraces new areas that also need to be covered by AONB status.</p>	<p>extending the SC&H AONB, and therefore it can reasonably be assumed, of the desirability of designation.</p> <p>Objection to the proposed extensions and specifically disagreement regarding consensus was almost entirely from a small number of landowners/ farmers (supported by the CLA and a land agent) and tended to be with regard to their own landholdings and to be on the basis that designation is unnecessary given the existing management already in place and that there will be increased bureaucracy and regulation, and that Permitted Development Rights will be withdrawn. We have addressed each of these concerns elsewhere in this report.</p> <p><u>Desirability of designation of the proposed Samford Valley and Freston Brook extensions</u></p> <p>Although fewer responses were received from members of the public with regard to the proposed Samford Valley and Freston brook extensions, it is apparent from the consultation that there is a widespread consensus from the statutory consultees (notably Babergh DC and Suffolk CC within which this proposed extension is located), from the SC&H and Dedham Vale AONB Partnerships and members of the public who responded, that a consensus exists, that it is desirable to designate both proposed extensions along with the Stour estuary as a part of the SC&H AONB.</p> <p>Objection to the proposed Samford Valley extension and specifically disagreement regarding consensus, was almost entirely from 3 landowners/ farmers (supported by the CLA and a land agent) and tended to be with regard to their own landholdings and on the basis that designation is unnecessary given the existing management already in place and that there will be increased bureaucracy and regulation, and that Permitted Development Rights will be withdrawn. We have addressed each of these concerns elsewhere in this report.</p> <p>No objection to the desirability of designating the proposed Freston Brook extension was received from any respondents identifying themselves as landowners/ farmers or from the CLA.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p><u>ANON-TK46-6MM4-D</u> The extension to the southern side of the Stour has been in Tendring DC Local Plan for a number of years it has also been treated as part of the project area of Suffolk Coast & Heaths AONB so it makes sense to give it protected landscape status.</p> <p><u>ANON-TK46-6MDM-W</u>: Ever since the 1990's there has been a strong groundswell of opinion locally to correct this omission and bring the whole Stour Estuary under one national landscape designation. I still feel strongly as a retired senior officer of TDC that this designation should go ahead.</p> <p><u>ANON-TK46-6M5P-H</u> The south side of the estuary is just as sensitive as the north and needs protection.</p> <p><u>ANON-TK46-6M5R-K</u>: It is a naturally beautiful place that deserves protection.</p> <p><u>ANON-TK46-6MBQ-Y</u>: This uniquely undisturbed {sic} should enjoy continued protection against commercial developments.</p> <p><u>ANON-TK46-6MM4-D</u>: It has always been part of the AONB's project area so it is only fitting it should be given protected landscape status.</p> <p><u>ANON-TK46-6MZZ-Z</u>: All natural beauty should be designated and looked after if at all possible.</p> <p><u>ANON-TK46-6MKS-A</u> That natural habitat and beauty should be protected for future generations.</p> <p><u>ANON-TK46-6M5R-K</u> It should be preserved for future animal and human generations to use and enjoy in its present state.</p> <p><u>ANON-TK46-6M5X</u>- I am keen that it is kept secure by this proposed designation for us now and for future generations.</p> <p><u>ANON-TK46-6M55-P</u>: It is an opportune moment to protect this area from further encroachment and ensure that future generations can enjoy its natural beauty.</p> <p><u>ANON-TK46-6MB9-7</u> the extension will fully protect this area</p> <p><u>ANON-TK46-6MBF-M</u>: To protect existing natural beauty and encouraging wild life. The main reason for us moving here and enjoying village life.</p>	<p><u>Conclusion</u>: Natural England considers that there is a strong degree of consensus with regard to the desirability of designation of the proposed extensions as a part of the SC&H AONB. The overall support of the statutory consultees; the SC&H AONB Partnership and the public overall is particularly noted and is recognition of a consensus of support for the desirability of extending the SC&H AONB.</p> <p>Natural England does not consider however that the lack of support for the desirability of designation from the landowners/ farmers who responded is based upon credible evidence with regard to the statutory AONB purpose. Furthermore it considers that designation will not have a negative impact on the operation of their farm businesses in the way that responses from this group have suggested. Their more specific concerns with regard to the desirability of designation are considered under relevant themes in this Table below.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p><u>ANON-TK46-6MB9-7</u> :The area of great natural beauty and needs to be fully protected</p> <p><u>ANON-TK46-6M98-W</u> (ad info) The Stour valley estuary is a thing of natural beauty, everything should be done to keep it that way.</p> <p><u>BHLF-TK46-6MMR-B</u>: We really need to protect the countryside character and appearance of the area and we hope adjacent land will not be used for residential development</p> <p><u>ANON-TK46-6M9T-S</u>: It is important that the view from vantage points on the north shore of the Stour Estuary are beautiful and this needs to be protected, for example, a large tank farm was constructed at Parkstone Quay some years ago detracting from the landscape.</p> <p><u>ANON-TK46-6MMY-J</u>: It is right to protect natural areas in these days of using green land for building works.</p> <p><u>ANON-TK46-6MD2-2</u>: To protect its unique character.</p> <p><u>ANON-TK46-6MDC-K</u>: Area at risk of development and so needs protection.</p> <p><u>ANON-TK46-6MDF-P</u>: As well as giving protection to important wildlife and views AONB would have economic benefits for the area.</p> <p><u>BHLF-TK46-6MDX-8</u>: Protecting both sides of this section of the Stour Estuary is the only way to protect the view from both sides.</p> <p><u>ANON-TK46-6MDZ-A</u>: The designation will give added protection to this nationally important land/seascape.</p> <p><u>ANON-TK46-6M9Z-Y</u>: it needs to be protected but also promoted as an area to appreciate.</p> <p><u>ANON-TK46-6MBW-5</u>: It should be preserved.</p>	

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p><u>ANON-TK46-6M9H-D</u>:</p> <p><u>ANON-TK46-6MMD-W</u>: Protecting this side enhances the views from either side</p> <p><u>ANON-TK46-6M5N-F</u>: To give it equal protection to that enjoyed by the adjacent AONB.</p> <p><u>BHLF-TK46-6MMR-B</u>: We need to protect land and visual amenity in the area</p> <p><u>ANON-TK46-6MB1-Y</u>: Need to provide more protection for birds in view of port expansion and local industry in recent years.</p> <p><u>ANON-TK46-6MBS-1</u>: It is important to include all contiguous areas of, and near, the Stour estuary because of the benefits of the wider designation to the existing designated area, and because of the greater protection that would be afforded to the area of the estuary.</p> <p><u>ANON-TK46-6MMU-E</u>: To protect currently unspoilt areas left on the South side</p> <p><u>ANON-TK46-6MDZ-A</u>: The current designated area is only one side of the estuary, it makes much greater sense to designate both sides and so give protection to the entire estuary.</p> <p><u>ANON-TK46-6MB6-4</u>: An extension of the AONB to cover this area would protect the character of the landscape for future generations.</p> <p><u>Objecting to designation: with specific regard to the desirability of designation of the proposed Stour estuary extension</u></p> <p><u>ANON-TK46-6MB2-Z</u> We hope you can see that Ragmarsh farm does not meet the AONB criteria for so many reasons. This is a busy working farm that looks after our land but also must have it producing to the best of its ability. Farming is about change, development, diversity and future farming needs. We feel that our area has enough constraints.</p>	

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p><u>ANON-TK46-6MD6-6</u>: Unnecessary and potentially restrictive when the area of note cannot easily be changed or developed anyway.</p> <p><u>Supporting designation: with specific regard to the desirability of designation of the proposed Samford Valley extension</u></p> <p><u>ANON-TK46-6M97-V</u> Stutton Parish Council would like to offer its full support to the proposed extension that falls within its parish boundary.</p> <p><u>ANON-TK46-6M9H-D</u>: We need to protect such beautiful areas for people to enjoy. The close link to the Dedham Vale AONB protects a swath of quintessentially English landscape.</p> <p><u>ANON-TK46-6MZH-E</u>: The larger the area the greater benefits to people and wildlife.</p> <p><u>ANON-TK46-6MDZ-A</u>: It is a natural extension to the AONB.</p> <p><u>ANON-TK46-6MBP-X</u> The members of the Tattingstone Parish Council are in full support for the extension of the AONB as it will help protect the natural beauty of the village and surrounding areas.</p> <p><u>ANON-TK46-6M5N-F</u>: To give it equal protection to that enjoyed by the adjacent AONB.</p> <p><u>ANON-TK46-6M93-R</u>: Protection and Support.</p> <p><u>ANON-TK46-6MB9-7</u>: AONB STATUS WOULD PROTECT THIS AREA</p> <p><u>Objecting to designation: with specific regard to the desirability of designation of the proposed Samford Valley extension</u></p> <p><u>ANON-TK46-6MDS-3</u> CLA: There are a number of points which dispute the view that it is desirable to designate the Samford Valley area as an AONB.</p>	

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>a. Lack of consensus²: One of the fundamental questions Natural England must take into account is whether there is a consensus of opinion that an area meets the statutory criteria or should be designated. In the case of the area to the west of the Samford Valley there is not a consensus of opinion, as evidenced below:</p> <ul style="list-style-type: none"> • This area of land was not acknowledged as an area of interest when the original AONB boundary was put in place, nor was it referenced as an area of interest in any further part of the Designation History, or included in the AONB Additional Project Area. The first mention of the inclusion of this area in the AONB is detailed in the Natural Beauty Assessment when the Initial Study Area was extended westwards. Natural England provide no suggestion as to why this area was of no interest to those wishing to extend the boundary. • The Assessment of whether it is desirable to vary the boundary provides no evidence of consensus for the west of the Valley, only mentioning the eastern end of the Samford Valley Extension Area. • Most importantly however, the landowner who owns much of the land to the west of the Samford Valley, and arguably the individual upon whom a designation will most greatly impact, is not in agreement with the designation. The lack of consensus also provides further evidence of the unlikely match of this area with the existing AONB. With a historic lack of interest in the area being part of the AONB it again brings into question why the area to the far west has been included. <p><u>ANON-TK46-6MDS-3</u>: There is a lack of evidence of consensus or need to improve conservation efforts in this area. Overall therefore the CLA do not agree with the proposed boundary.</p> <p><u>ANON-TK46-6M9W-V</u>: I would have to disagree with your consultation document. In your section headed 'Significance', Natural England make</p>	

² The other points made by the CLA are recorded and addressed in other Tables relevant to the desirability of designation

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>comments which show that they have no real insight into the valley, nor its recent history. There appears to be a lack of consensus of opinion that the area meets the statutory criteria or should be designated. If this is the case and also where landowners and land managers are opposed to the proposed extension then it should definitely not proceed.</p> <p><u>ANON-TK46-6M9W-V {Analyst: Additional Info sent to Chairman}</u> I am going to limit my comments to the proposed Samford Valley extension which for various reasons, and as a landowner within it, I consider to be completely incongruous to the existing AONB. I am not going to pass comment on the other proposed extensions, other than to say that there is considerable discontent from some excellent land managers, particularly on the Essex side, and if it was me I would be very worried about alienating those that do so much for the environment.</p> <p><u>Supporting designation: with specific regard to the proposed Freston Brook extension</u> BHLF-TK46-6MM9-J: Yes it is a natural extension from the current ANOB {sic} and should be protected</p> <p>BHLF-TK46-6MM9-J: Yes. It is very important as an extension into woodland for nesting birds throughout the ANOB</p> <p><u>Other</u> <u>BHLF-TK46-6MBX-6</u> The RSPB are willing and active partners of the Suffolk Coasts and Heaths Unit AONB partnership. As is reflected in their letter of the 17 April to this consultation, some partners will have responses that are tailored to their individual interests. The charitable objectives and expertise of the RSPB does not cover matters regarding landscape. Our focus is on the important wildlife and habitats within the area and ensuring that the protected area network remains strong. Our ongoing interest will primarily be supporting action to improve the fortunes of species and habitats which we consider are a priority within the AONB and we will look to work positively with a range of different partners to secure sustainable, long-term management for those.</p>	

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
<p>Rarity and Representative-ness</p>	<p><u>Supporting designation</u></p> <p><u>ANON-TK46-6M9N-K</u>: Given that the southern shore mostly reflects the AONB on the northern shore its seems a trifle incongruous that, with its numerous of nature reserves, slightly different aspects of light and landscape should not be included. In many ways, because of historic development and accessibility, the proposed extension is what people think of as the beautiful Stour Estuary and where they come to visit to enjoy the views. It speaks to their core being.</p> <p><u>ANON-TK46-6MMU-E</u>: The extension to cover areas of the south bank will complement the areas already designated ensuring their views, for example do not deteriorate. The Stour valley is a beautiful area and the more of it that is protected the better.</p> <p><u>ANON-TK46-6MZ6-V</u>: The interglacial deposits at Wrabness are linked with those at Stutton and Harkstead on the north bank of the estuary, and together they tell the post-Anglian story, of not only the Stour, but also the Orwell and Deben Estuaries. A story of regional, possibly national importance such that the Wrabness site should be designated along with the rest of the AONB.</p> <p><u>BHLF-TK46-6MZN-M</u>: The north bank is already so designated, and already influenced by the beauty and proximity of the river. If that premise is accepted, it seems quite illogical not to include the river itself, and at least part of the south bank.</p> <p><u>ANON-TK46-6MZ6-V</u>: The faulting in the London Clay exposure at Wrabness in conjunction with similar exposures along the Orwell estuary gives evidence of the tectonic history of this area and possibly the location of the three estuaries. It is of regional importance and should be part of the overall designation.</p>	<p><u>Commentary:</u></p> <p>The issues raised in consultation broadly relate to opinions as to whether the proposed extension shares characteristics similar to that of the existing AONB and whether the current or proposed boundary relates to areas of similar landscape quality.</p> <p>Natural England agrees with those respondents who stated that the Stour Estuary is representative of the estuaries on the East Anglian coast within the Suffolk Coast & Heaths AONB and that together, this suite of estuaries as a whole is of national importance, adding weight to the desirability of its designation. Natural England also considers that its expansive and open character with its breadth and relatively straight form is a defining characteristic, rare and unique in the context of the SC&H AONB, also adding to the desirability of its designation. This proposed extension, encapsulates the best of this expansive and inward focusing estuarine landscape along with the northern estuary slopes.</p> <p><u>Conclusion:</u></p> <p>Natural England considers that the proposed extensions to the SC&H AONB are representative of areas already within the designated area.</p>

4.8 Analysis of Qualitative Responses re. Desirability of Designation: Issues Affecting Special Qualities

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
<p>Samford Valley proposed extension: The perceived threat to natural beauty if land is designated</p>	<p><u>Objecting to designation</u></p> <p><u>ANON-TK46-6M9W-V</u>: Natural England's reasons for including the Samford Valley and also the other proposed extensions appear to be very shallow and largely reliant upon the continued goodwill and management practices of existing land managers. Having attended a meeting or two it appeared to me and I am certain will have been quite clear to Natural England that designating land against the wishes of the owners/land managers will be hugely detrimental to both the perceived natural beauty and to the environment.</p> <p>Without the support of landowners etc. these "improvements" are at risk of being undone or no longer managed. If landowners consider that, by being forcibly designated, they are being punished for being good land managers then I fear, environmentally, for any AONB extension.</p>	<p><u>Commentary</u></p> <p><u>ANON-TK46-6M9W-V</u>: Natural England has assessed the proposed extension of parts of the Samford Valley as having outstanding natural beauty. It acknowledges that the positive activities of land managers over the years have been an important contributing factor, amongst other factors, in reaching this conclusion. It also recognises the contribution made by publically funded initiatives such as through agri-environment schemes to this positive management.</p> <p>Should the proposed extension of the SC&H AONB in the Samford Valley be confirmed, land managers would be free to manage their land in exactly the same way as previously and no activity could be undertaken against the will of the landowner or manager.</p> <p>With regard to the future of agri-environment schemes in the context of Brexit, although there is current uncertainty with regard to the nature of future schemes, it is reasonable to expect that priority for future public funding will be given to areas recognised as being nationally important, such as AONBs and therefore also a reasonable expectation of additional resources being made available to support positive land management.</p> <p><u>Conclusion</u></p> <p>It is difficult to understand why land managers should feel compelled to change the positive manner in which they manage their land as a direct consequence of the area being designated as an AONB (as implied by this response) or why designation should be perceived as being a 'punishment'. AONB designation can make a positive contribution to supporting land managers in undertaking environmentally positive management activities.</p>
<p>Estuarine issues such as fishing, mussel farming bait digging, boat access,</p>	<p><u>Supporting designation</u></p> <p><u>ANON-TK46-6MDW-Z</u>: This is a vast area supporting marine/aquatic/wet life with relatively little commercial pollution that should be maintained if at all possible and to which an AONB would contribute.</p>	<p><u>Commentary</u></p> <p><u>The issues raised have been divided into the following subthemes:</u></p> <ul style="list-style-type: none"> • A) Fishing and mussel farming and Marina developments • B) Flooding and erosion <p>A) Fishing and mussel farming and Marina developments</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
flooding and erosion	<p><u>ANON-TK46-6M9T-S</u>: There is at present an application for extensive mussel farms on the Stour Estuary, such farming operations could interfere with the quiet beauty of the estuary and its wildlife. Compared with the Orwell Estuary which is heavily utilised by commercial shipping and leisure craft, the Stour remains unspoilt and quiet and for example no marinas have been developed there which have crowded the beautiful Orwell Estuary. The AONB designation would protect the Stour from possible Marina development which could occur at several sites on the southern shore.</p> <p><u>Other</u></p> <p><u>ANON-TK46-6MZF-C</u>: We are also concerned about the implications of the proposed mussel farm and any other commercial use of the river or its shoreline.</p> <p><u>ANON-TK46-6MBQ-Y</u>: Upgrading and Maintenance of Sea Defences please, also in light of rising sea levels and exposure to increased climate turmoil.</p> <p><u>ANON-TK46-6MB3-1</u>: A section of this area is suffering from erosion and could potentially be lost.</p>	<p>Activities such as fishing, bait digging and boat access are subject to their own regulation unrelated to AONB designation and are reflected in the Stour and Orwell Estuaries Management Strategy 2016 – 2020 which aims to ensure the conservation of the estuarine landscape and wildlife.</p> <p><u>ANON-TK46-6M9T-S</u>: Applications must be made to the Department for Environment, Food and Rural Affairs (Defra) in England for authorisation to set up an aquaculture production business including for mussel farming. The government can make Orders for the establishment and improvement of private shellfisheries and to improve the management of natural shellfisheries. There are two types of order: - Several Orders, which are granted for setting up or improving private shellfisheries; and - Regulating Orders, which give the right to manage exploitation of a natural shellfishery.</p> <p>Marina development falls under the responsibility of local authorities and forms part of their general planning management functions in the same way as other types of development. Local authorities are relevant authorities under S85 of the CROW Act and thus have the same general statutory duty as placed upon all relevant authorities requiring them to have regard to the statutory AONB purpose in fulfilling this responsibility.</p> <p>C) Flooding and erosion</p> <p><u>ANON-TK46-6MBQ-Y</u>: The Water Resources Act 1991 and the Land Drainage Act 1991 (amended by the Land Drainage Act 1994) provide the enabling primary legislation for sea defence works for the control of flooding. The Environment Act 1995 includes the management of water levels as part of the roles of the Environment Agency, Internal Drainage Boards (IDBs) and Local Authorities.</p> <p><u>ANON-TK46-6MB3-1</u>: District authorities in coastal areas are Coastal Protection Authorities and lead on coastal erosion risk management activities in their area. They are responsible for developing Shoreline Management Plans (SMPs) which provide a long term holistic framework for managing the risk of coastal change on their section of the coast. The Environment Agency has a strategic overview to ensure that decisions about the coast are made in a joined-up manner.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
		<p>All of the public bodies referred to in the two headings above are relevant authorities under S85 of the CRoW Act and thus have a statutory duty to have regard to the AONB purpose and to ensure the conservation and enhancement of natural beauty is given appropriate priority in their policy and resource decision making. This duty would immediately apply should the proposed extensions be designated.</p> <p>This would ensure that these relevant authorities take account of the statutory AONB purpose when coming to decisions or carrying out their activities relating to or affecting land within these areas. This duty applies to any decisions or activities a relevant authority may take affecting land in these areas; not just to those that relate to narrowly-defined environmental or 'countryside' issues. However this duty does not override particular obligations or considerations which have to be taken into account by relevant authorities in carrying out any function.</p> <p>Beyond this, the SC&H AONB Unit run a Coast and Estuary Warden scheme which has been running since 2009 and provides an opportunity for estuarine issues and regulatory infringements to be noted and reported to the appropriate authorities.</p> <p><u>Conclusion</u></p> <p>Natural England considers that AONB designation will ensure that the statutory AONB purpose is recognised as an essential consideration in reaching decisions or undertaking activities related to all estuarine issues. Any land based ancillary development requirements such as that associated with flood management, mussel farming or marina developments would also fall under the responsibility of the local planning authority.</p>

4.9 Analysis of Qualitative Responses re. Desirability of Designation: AONB Mechanisms Powers and Duties

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
<p>The suggestion that the area is already well managed and the benefits or otherwise of integrated management in AONBs</p>	<p><u>Supporting designation</u></p> <p><u>BHLF-TK46-6MMP-9</u> {ECC}: Essex County Council (ECC) recognises the value of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (SCH AONB) and has long held the opinion that there is land in Essex of comparable landscape quality, which would benefit both from AONB designation and a similar countryside management approach being adopted. It is for this reason that, since 1993, ECC has been making a discretionary funding contribution to the SCH AONB, in exchange for the provision of a countryside management service, in an area known as the “Additional Project Area” (see Appendix 1 of the Essex CC response which comprises the SC&H AONB partnership response).</p> <p><u>ANON-TK46-6MMH-1</u>: The proposed boundary extension to the north and south of the Stour valley - and the inclusion of the Stour estuary - will significantly help to integrate this southern part of the AONB. In broad terms, both valley sides of the Orwell and its estuary are all covered by the present AONB designation - as are the Deben and Alde/Ore valleys and their estuaries further north in the AONB. It is logical and appropriate to apply the same principle to the whole of the Stour valley, from its northern to its southern plateau edges, including its estuarine component.</p> <p><u>ANON-TK46-6M9U-T</u>: To date it is relatively undeveloped and need to be carefully managed.</p> <p><u>ANON-TK46-6MMU-E</u>: The Stour valley is already designated partly as AONB to extend this to both sides would obviously be of a benefit.</p> <p><u>ANON-TK46-6MBM-U</u>: The south bank of the Stour Estuary has a lot of potential for outdoor amenity and tourism which could be managed to help maintain the natural beauty of the area.</p> <p><u>ANON-TK46-6M5E-6</u>: Improve access to the area e.g. by better rail and bus links (for example more bus services connecting with trains at Manningtree)</p>	<p><u>Commentary:</u></p> <p><u>The issues raised have been divided into the following subthemes:</u></p> <ul style="list-style-type: none"> • A) Benefits of integrated management within an AONB • B) The future management of the Dodnash Priory site • C) The contribution made by agri-environment schemes • D) The positive impact made by existing land management • E) Regulation or restrictions on land management within an AONB <p>A) Benefits of integrated management within an AONB The proposal to extend the SC&H AONB must not under any circumstances be seen to be a consequence of any perception of poor management. Responsibility for land management remains entirely unchanged by AONB designation. Designation as AONB however, secures the application of available additional skills, advice, expertise and resources to the areas concerned and places a duty on the part of statutory undertakers to have regard the statutory AONB purpose. Together these contribute to an integrated approach to management as set out the SC&H AONB Management Plan.</p> <p>B) The future management of the Dodnash Priory site <u>ANON-TK46-6M9N-K</u>: The site of the 12th Century Augustinian Dodnash Priory, is now a Scheduled Monument located within the main river valley. Although there are thought to be no physical remains of the Priory itself, there is some evidence in the vicinity, including a pond (perhaps former fish ponds) and a section of stone wall. There is also evidence of some reused Medieval stone at Dodnash Priory Farm. AONB designation could help to secure resources, if deemed necessary and appropriate, for its future management or interpretation. The future management of the site of the 12th Century Augustinian Dodnash Priory (a Scheduled Monument) has the potential to benefit from designation through the allocation of resources and practical skills available via the SC&H AONB team where appropriate and with the agreement of the landowner.</p> <p>C) The contribution made by agri-environment schemes</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>so people do not have to drive and clog up roads and car parks on the AONB when they visit which will detract from the natural beauty.</p> <p><u>ANON-TK46-6M5Q-J</u>: The influx of visitors as a result of the Grayson Perry house next to Wrabness village, potentially threatens the delicate nature of the environment in this area and needs managing carefully, which designation as AONB would allow.</p> <p><u>ANON-TK46-6M9N-K</u>: The site of the ancient priory is becoming more hidden and without sensitive management of the area the sense of a historic settlement will be lost. The number of native species such as bluebells and skylarks in the area are potentially under threat from injudicious management and the area would be much the poorer for it.</p> <p><u>ANON-TK46-6MK6-D</u>: Yes: it will provide it with protection from, for example, woodland clearance.</p> <p><u>ANON-TK46-6MDW-7</u>: Given the above observation {analyst's note: '<i>Although arable and livestock farming is the main commercial activity of the area it is also well wooded</i>' }; new plantings will mature within the next couple of decades during which time they will need whatever protection can be made available whilst they grow to maturity. This area also has a number of ponds and lakes that are supporting wildlife which an AONB could help to preserve to the benefit of conservation. 'Nine Oaks' is gradually being developed as a nature reserve (with the planting of 4,500 trees - in conjunction with the Forestry Commission & The Woodland Trust - and the development of a small lake to enhance the present water meadow area).</p> <p><u>BHLF-TK46-6MMR-B</u>: The Holly Wood area has recovered from the storm of 87 and needs to be retained and managed</p> <p><u>BHLF-TK46-6MDX-8</u>: The land south of School Lane, known as Pattles Fen or the Millennium Wood and run by the Woodland Trust is a wonderful asset within a large village. The rest of the area, the Samford Valley & Dodnash has an extensive network of footpaths that should be enhanced by inclusion within the AONB.</p>	<p><u>ANON-TK46-6MDS-3</u> Agri-environment schemes are particularly important in helping to deliver integrated land management and the importance of such schemes is acknowledged by the respondent. In the context of the likelihood of such schemes being significantly changed following Brexit, then it is entirely possible that AONB designation could bring greater resources and concentration of agri-environment grants if nationally designated areas are prioritised. Such resources are always likely to be targeted to places where they will have the greatest impact. In relation to agri-environment schemes, historically that has meant designated areas, rather than wider countryside.</p> <p>D) The positive impact made by existing land management <u>ANON-TK46-6MDS-3 & ANON-TK46-6M9W-V</u>: The proposal to extend the SC&H AONB must not under any circumstances be seen to be a consequence of any perception of poor management and responsibility for land management remains entirely unchanged by AONB designation. On the contrary it is acknowledged that positive land management practices have contributed to NE's assessment that the proposed areas are of outstanding natural beauty, alongside other relevant factors.</p> <p>E) Regulation or restrictions on land management within an AONB <u>ANON-TK46-6M9W-V</u>: Natural England does not agree that designation as AONB would create any additional bureaucracy or restriction with regard to the management of land. Landowners retain exactly the same control over how they manage land within an AONB as they do outside one. Designation can bring additional access to advice and potentially grant aid (eg resources for undergrounding power lines available in AONBs). Agri-environmental schemes provide an incentive to achieve environmental benefits beyond those expected to be achieved simply as a consequence of land management decisions governed by market forces and designation can provide an opportunity to further enhance the environmental quality of specific areas where appropriate as set out in the consultation document.</p> <p>Conclusion: Natural England remains of the opinion that extending the AONB boundary to encompass the Stour estuary, Samford valley and Freston Brook proposed extensions will provide a positive impetus with regard to future land management initiatives and that the concerns of landowners as expressed in</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p><u>ANON-TK46-6MMH-1</u>: I welcome the proposed inclusion of the area at the northern edge of Brantham, which takes in The Woodland Trust property of Pattles Fen. Although relatively small in extent, the woodland, fen and lichen heath habitats accessed by paths and boardwalk are a welcome element of the natural capital of the village and enjoyed by many people.</p> <p><u>Objecting to designation</u></p> <p><u>ANON-TK46-6MDS-3</u>: {CLA} Existing management: The area to the far west has been managed to the highest standard under agri-environment schemes for many years; efforts which are noted in the Natural Beauty Assessment. The Guidance for Assessing Landscapes document states that consideration should be given as to whether the purposes of the AONB, the conservation and enhancement of the natural beauty of an area, can be delivered effectively using current arrangements. In this case it can be argued that as the area is already managed to the highest standard and has a strong history of such management, as can be evidenced by Natural England, current arrangements are sufficient to can deliver conservation and enhancement of the area's natural beauty. These longstanding efforts do not need the additional bureaucracy that comes with AONB designation.</p> <p><u>ANON-TK46-6M9W-V</u> Natural England's reasons for including the Samford Valley and also the other proposed extensions appear to be very shallow and largely reliant upon the continued goodwill and management practices of existing land managers. Having attended a meeting or two it appeared to me and I am certain will have been quite clear to Natural England that designating land against the wishes of the owners/land managers will be hugely detrimental to both the perceived natural beauty and to the environment.</p> <p><u>ANON-TK46-6M9W-V</u>: The woods, hedges, irregular- shaped meadows and wet pasture are only as they are because land managers and landowners, often very recently, have reverted arable land back to grass, planted hedges, replanted woods etc. Without the support of landowners etc. these "improvements" are at risk of being undone or no longer managed. If landowners consider that, by being forcibly designated, they are being punished for being good land managers then I fear, environmentally, for any</p>	<p>some responses are unfounded. AONB designation should not be considered as a threat to existing management practices but instead should be regarded as an opportunity to secure continued support and recognition for existing and future positive environmental management.</p> <p>The duty of regard placed upon public bodies which would immediately apply if legal Orders extending the SC&H AONB come into effect, would further help to ensure that the existing high levels of environmental management undertaken within this proposed extension were recognised and reflected in future decision making by statutory undertakers.</p> <p>Designation would ensure that the statutory duties and powers associated with an AONB apply and that particular account is paid to the area's special qualities and natural beauty when planning for future development in the Samford Valley, adding weight to the case for designation. Babergh DC already has experience of and expertise in, determining planning casework within the original area designated as SC&H AONB as does Tendring DC with regard to the Dedham Vale AONB.</p>

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	<p>AONB extension. Natural England have a complete lack of understanding of how land management operates. Improvements and environmental projects are quite simply profit driven and by removing permitted development rights and generally adding cost and red tape to land managers seriously undermines their ability to fund such projects.</p> <p><u>ANON-TK46-6M9W-V</u> The consultation document lists the issues affecting the area's special qualities. Again Natural England show a distinct lack of local knowledge and in doing so, by proposing the full extent of the proposed extension, have seriously detracted from the special qualities the existing AONB enjoys. At both of the open consultation meetings held at Lawford Venture Centre, it was stressed that the AONB would have "no impact on how landowners manage their land in an AONB". However in the consultation document it clearly states that "the following issues are currently experienced in this area and are relevant in considering the difference an AONB designation may make". This very reference implies that the designation of an AONB is exactly opposite to what the assembled groups at both meetings were told by Natural England, that the AONB would have no impact on how land managers manage their land. The document clearly states that the idea of a designation will mean that Natural England can, by the use of an AONB, impact upon land management. Tragically such interference can only end in tears with the only real losers being the flora and fauna of this area.</p>	
<p>The suggestion that AONB designation is not necessary given the existence of a local landscape or other designation</p>	<p><u>Objecting to designation</u></p> <p><u>ANON-TK46-6MDS-3 {CLA}</u> The proposed areas of the highest quality are already the subject of important environment designations such as the Stour Estuaries SPA and Ramsar Site and estuary and Stour and Copperas Woods SSSIs, as noted in the various assessments.</p> <p><u>ANON-TK46-6M9R-Q</u>: The Dodnash wood area already has its own special landscape area designation so no need to more layers of 'designation'</p>	<p><u>Commentary:</u></p> <p>The issues raised have been divided into the following subthemes:</p> <p>A) Stour Estuaries SPA and Ramsar Site and estuary and Stour and Copperas Woods SSSIs</p> <p>B) <u>B</u> The Dodnash Wood 'Special Landscape Area' designation</p> <p>A) Stour Estuaries SPA and Ramsar Site and estuary and Stour and Copperas Woods SSSIs</p> <p><u>ANON-TK46-6MDS-3 (CLA)</u>: SPA, Ramsar and SSSI's are all designations which have specific and separate purposes to AONB designation and are solely related to biodiversity. The flora and fauna found in designated areas often makes a significant contribution to natural beauty and was taken into</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
		<p>account during the natural beauty assessment, alongside other relevant factors.</p> <p>B) The Dodnash Wood ‘Special Landscape Area’ designation <u>ANON-TK46-6M9R-Q</u>: For many years an area around Dodnash Wood has been included in a local landscape designation called the ‘Dodnash Special Landscape Area’ (SLA). This was a local level planning designation originally included in the Suffolk Structure Plan and subsequently in Babergh DC local planning documents and was the subject of specific local plan policy.</p> <p>Local landscape designations give an indication that an area has local-level value for its landscape qualities. This does not however have an equivalence with nationally recognised AONBs and many local authorities have now replaced them with district-wide landscape character based policies. Babergh DC’s 2014 Core Strategy and Policies (2011-2031) included a statement that although the adopted and saved Local Plan Policy CR04 with regard to SLAs remained extant at that point in time, a review of the SLA approach should be undertaken, including whether to retain the designation and if so which areas should be covered.</p> <p>Subsequent landscape guidance produced as a joint Supplementary Planning Document in 2015 by Babergh and Mid Suffolk DCs makes no mention of Special Landscape Areas. Both local authorities are now in the process of developing a joint Local Plan. With regard to the approach to landscape generally and to Special Landscape Areas (SLAs): although SLAs remain in the current Babergh DC local planning documents, the intention on the part of both local planning authorities is understood to be that SLAs will not feature in the future joint plan and will be replaced by district-wide landscape policy {personal communication from Dan Malloy, planning officer, Babergh DC 21st November 2018.</p> <p>Conclusion: The presence of other landscape and biodiversity designations within the proposed Stour estuary extension provides further justification for designation as AONB as it is evidence that the area has long been considered of value for its landscape and biodiversity, and thus contributes to the strength of evidence that designation is desirable.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
		<p>Local Landscape Designations do not however afford the same level of opportunities to conserve and enhance the natural beauty of the area as AONB designation and by definition are not recognised as being nationally important. Moreover the continued use of this local designation by Babergh DC including by implication in relation to Dodnash wood appears unlikely in future.</p>
<p>Funding and resources</p>	<p><u>Supporting designation</u> ANON-TK46-6MMH-1: Although I realise this next comment should be more fully considered at another time, in order to ensure the benefits of AONB extension are optimised, an appropriate increase in resources is required to ensure that the staff and volunteer workforce can meaningfully enhance the landscape and natural beauty of the extended AONB for the benefit of all.</p> <p><u>Objecting to designation</u> ANON-TK46-6MDS-3 {CLA} The landscape is not a free good; its management uses resources which have alternative uses and value. The environmental value of a habitat, a landscape or a historic building must be underpinned either by a public payment for the delivery of public goods/services or by an economic use. Similarly, policies to conserve the richness of our flora, fauna and landscape must therefore work with, not against, the grain of rural business and must be underpinned by evidence and sound science. ANON-TK46-6MD6-6: Personally I think it is a lovely area and alongside many others I enjoy the area a great deal, however I think this process is a waste of resources.</p> <p><u>Other</u> BHLF-TK46-6MMP-9 {ECC} It is possible that, should the boundary review not confirm an extension into Essex, consideration could be given to discontinuing the discretionary payment. The value of the Additional Project Area, has not only been recognised by ECC but also by the wider AONB partnership, which has held an aspiration for a Boundary Review since at least 2009.</p>	<p><u>Commentary:</u> Questions of funding and resources are relevant to considerations of the desirability of designation in so far as they impact directly on the statutory AONB purpose to further the conservation and enhancement of natural beauty within the area proposed for designation.</p> <p>Areas designated as AONB can expect to have additional resource available to them compared to that generally available in the wider countryside. Paragraph 5.2.5 of Natural England’s “Assessment of whether it is desirable to vary the boundary of the AONB in order to conserve and enhance Natural Beauty” (September 2017) sets out the current funding arrangements for the SC&H AONB and provides examples of where the AONB team have secured additional financial resources and grants for work in the area. A recent example of additional funds being made available for AONBs is that the National Association of AONBs were awarded £164,300 from the Heritage Lottery Fund’s Resilient Heritage grant scheme in July 2018, including for a professional development programme for up to 40 AONB staff nationally.</p> <p><u>BHLF-TK46-6MMP-9 {ECC}:</u> The tangible support over the years that the Essex local authorities have provided to the SC&H AONB and particularly in the specific context of the Additional Project Area is acknowledged and applauded. Although account has been taken of the possibility that this may be discontinued, this can never be an overriding consideration for NE when determining the desirability of designation.</p> <p><u>Conclusion:</u> AONB designation is an effective mechanism for safeguarding for future generations, England’s finest tracts of landscape, including their associated biodiversity and cultural heritage areas. Natural England considers that the</p>

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		<p>areas proposed for designation are nationally important and that the resources required to designate these areas represent a good investment for their future. The benefits of designation however go beyond resources and include for example, the duty placed upon statutory authorities to have regard to the conservation and enhancement of natural beauty.</p>
<p>Regulation</p>	<p><u>Objecting to designation</u></p> <p><u>ANON-TK46-6MD6-6</u>: Unnecessary and potentially restrictive when the area of note cannot easily be changed or developed anyway.</p> <p><u>ANON-TK46-6MDS-3</u>: {CLA} Tendring District Council put additional restrictions on the land south of the Stour in preparation for the reassessment of the boundary some years ago and therefore it could be seen that the area is already sufficiently protected and there is no need to impose further designation as an AONB.</p> <p>In this case it can be argued that as the area is already managed to the highest standard and has a strong history of such management, as can be evidenced by Natural England, current arrangements are sufficient to can deliver conservation and enhancement of the area's natural beauty. These longstanding efforts do not need the additional bureaucracy that comes with AONB designation....</p>	<p><u>Commentary:</u></p> <p>Confirmation of a legal Order varying the boundary of the SC&H AONB would not impose any new burden on business or agriculture, nor widen the expansion of regulatory activity. Local Authority functions are strictly limited with regard their AONB responsibilities and do not represent an increase in regulation.</p> <p>AONB and local authority staff work through partnership and persuasion, rather than by regulation. They do not have powers to direct activity, nor specifically to restrict use of private or public land in an AONB. They cannot for example compel a particular type of land use on farmland.</p> <p>The lack of impact on agricultural regulation for example is evidenced by the 2011 Report of the Farming Regulation Task Force, 2011. This Report contained approximately 200 recommendations for cutting 'unnecessary bureaucracy' in farming. None of these recommendations related to AONBs and no new regulations have been imposed on agriculture in AONBs since the publication of this Report.</p> <p>It is likely therefore that the references to regulation and bureaucracy from both these respondents (who are landowners) is likely in practice to relate to perceptions with regard to planning management. Responses specifically with regard to Town & Country Planning are dealt with below.</p> <p><u>Conclusion:</u></p> <p>Although it is apparent that some objectors and particularly landowners and land managers perceive there to be burdens or drawbacks arising from AONB designation, these perceptions are unwarranted and are not supported by objective evidence. Designation would not impose any new burden on business or agriculture, nor widen the expansion of regulatory activity.</p>

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National Planning Policy Issues	<p><u>Supporting designation</u> BHLF-TK46-6MME-X Suffolk CC: The extension of the AONB is fully compatible with the need to promote the growth of sustainable and prosperous communities. Proper identification of Suffolk’s most important landscapes should guide decision making in line with the National Planning Policy Framework, and in particular inform the design and mitigation of development proposals for both employment and housing.</p> <p><u>BHLF-TK46-6M9D-9</u> {SC&H Partnership} The consultation draft of the proposed revised National Planning Policy Framework, published on 5 March 2018, continues to place importance on the nationally designated AONBs in paragraph 170, which states: ‘Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty’</p> <p><u>Objecting to designation</u> ANON-TK46-6MDS-3: CLA members are concerned that the designation of the proposed areas will mean tighter restrictions on any future development that comes with AONB designation. They are particularly concerned that investment in their farming businesses, or delivering handfuls of affordable housing for local people will be significantly undermined if the designation is confirmed. This not only threatens the long term sustainability of the individual farms or businesses, but also adversely affects employment opportunities in these rural areas.</p>	<p><u>Commentary</u> Government planning policy since 2012 in the National Planning Policy Framework (NPPF) has set out how planning policies and decisions can help deliver sustainable development. This applies within National Parks and AONBs as elsewhere.</p> <p>The revised NPPF (July 2018) (para 8) emphasises that the three overarching objectives (economic, social and environmental) of sustainable development are interdependent and need to be pursued in mutually supportive ways so that opportunities can be taken to secure net gains across the different objectives.</p> <p>In relation to the natural environment, the NPPF recognises that in all areas, planning should contribute to and enhance the local natural environment. This explicitly includes (para 170) protecting and enhancing valued landscapes, recognising ecosystems services, providing net gains for biodiversity and establishing ecological networks.</p> <p>The revised_NPPF includes a specific AONB policy at Paragraph 172. This sets out the highest status of protection for landscape and scenic beauty in National Parks, the Broads and AONBs. It also states that the scale and extent of development within these designated areas should be limited and that major development should be refused other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. Nevertheless appropriate development within AONBs can provide an opportunity to secure environmental gains as well as meeting local economic and social objectives.</p> <p>Policies elsewhere in the NPPF which relate to AONBs and which provide that development should be restricted are:</p> <ul style="list-style-type: none"> • Footnote 6 to the paragraph 11 presumption in favour of sustainable development which includes AONBs as an area or asset of particular importance • with regard to entry-level housing exception sites (footnote 34, para 71); and • in relation to the provision of landbanks of non-energy minerals (para 205). <p>Other policies in the NPPF, for example those supporting rural housing where it will enhance or maintain the vitality of rural communities, restrictions</p>

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		<p>on the development of isolated homes in the countryside, enabling sustainable rural tourism and leisure developments which respect the character of the countryside and encouraging high quality design, apply in AONBs as they do elsewhere. The NPPF policies should be read as a whole in order to deliver sustainable development which meets the needs of local communities.</p> <p><u>Conclusion:</u> The revised NPPF maintains the highest level of protection in relation to conserving and enhancing the landscape and scenic beauty of AONBs and includes a limited number of specific policies restricting development within them. The NPPF does not prevent appropriate, sustainable development being granted permission e.g. affordable housing for local needs. Statutory development plans covering AONBs will set out policies to provide for appropriate development within AONBs which conserves and enhances the designated area whilst meeting local needs for housing and other development in line with the NPPF.</p>
Local Level Planning	<p><u>Supporting designation:</u> <u>ANON-TK46-6MM4-D</u> The extension to the southern side of the Stour has been in Tendring DC Local Plan for a number of years it has also been treated as part of the project area of Suffolk Coast & Heaths AONB so it makes sense to give it protected landscape status.</p> <p><u>ANON-TK46-6MKA-R:</u> With the currant proposed building in Essex and Suffolk it's even more important to conserve what we can</p> <p><u>BHLF-TK46-6MZK-H:</u> Anything that might help to ensure future developments in the proposed extension areas have minimum detrimental impact has to be worthwhile.</p> <p><u>ANON-TK46-6M9N-K:</u> There are many potential onslaughts to this beautiful area which include irresponsible development both domestic and industrial, poorly managed motor traffic as people strive to find some green space away from the urban developments, loss of field boundaries, insensitive use of agro chemicals thereby destroying valuable habitats, external influences such as changes in government policy etc.</p>	<p><u>Commentary:</u> Many supporters and some objectors to the proposed extensions to the SC&H AONB make reference in consultation responses to the planning system either as a positive tool for the conservation and enhancement of natural beauty or an unwanted burden on business and farming. It should be noted however that planning legislation, general processes and systems for plan making and development management decision-making - in virtually all aspects - are the same within AONBs as they are outside these designated landscapes.</p> <p>The statutory planning system in England also allows considerable discretion to local decision-makers not only to draw-up their own local plans but also to weigh the various different relevant policies in deciding where the balance of the plan lies in any case and also to depart from the plan where warranted. The NPPF's position with regard to AONBs however should assist local planning authorities to ensure that future development that occurs there reflects the national importance of this designation.</p> <p>The revised National Planning Policy Framework (NPPF) sets out the Government's national planning policies for England and how these are</p>

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	<p><u>ANON-TK46-6MDT-4</u>: The southern end of the Suffolk Coasts and Heaths AONB is coming under pressure: expansion of Felixstowe and Ipswich is natural and desirable, as the London commuter belt now reaches out to this area as evidenced by Ipswich's position as amongst the top 10 towns for property price increases in the country in 2017 (http://www.ipswichstar.co.uk/news/ipswich-described-as-a-property-hotspot-thanks-to-rise-in-house-prices-1-4980567). The current AONB between Felixstowe and Ipswich is a narrow and relatively isolated strip of land, and significant development around it risks jeopardise its attractiveness as much as development within it. As an employer in a City of London financial business looking to attract employees to the area, it seems critical that the features that make coastal Suffolk attractive are preserved on sufficient scale to have a meaningful impact for the region as a whole. The proposed expansion would help to achieve that by including areas that unambiguously deserve such protection.</p> <p><u>ANON-TK46-6MB1-Y</u>: Need to provide more protection for birds in view of port expansion and local industry in recent years.</p> <p><u>ANON-TK46-6M9U-T</u>: To date it is relatively undeveloped and need to be carefully managed.</p> <p><u>BHLF-TK46-6MMR-B</u> Babergh consultations include building right up to the new proposed boundary in Bentley and we would welcome the increased boundary in order to preserve the rural character of our "hinterland village".</p> <p><u>ANON-TK46-6MBP-X</u> {Tattingstone PC} It will also give limited protection to any developments proposed by Shotley Holdings (Collins Skip Hire).</p> <p><u>ANON-TK46-6MZH-E</u> It would be an act of desecration to risk development in an area which has always been this way for thousands of years.</p> <p><u>ANON-TK46-6MDF-P</u>: at risk of being adversely affected by unsympathetic development.</p> <p><u>ANON-TK46-6M9N-K</u>: There are many potential onslaughts to this beautiful area which include irresponsible development both domestic and and {sic}</p>	<p>expected to be applied by planning authorities in the preparation of development plans and in the determination of applications for planning permission. In circumstances where Local planning policy is not in conformity with the NPPF, determination of planning applications must be made in accordance with this national framework for planning.</p> <p>The NPPF requires the highest level of protection in relation to conserving and enhancing the landscape and scenic beauty of AONBs in relation to plans and planning decisions. However, as stated above, many other NPPF policies supporting development apply within AONBs as they do to other areas of countryside. This national level policy is implemented through local-level planning policy and decision making.</p> <p><u>BHLF-TK46-6MMR-B</u> For many years Babergh's local plan has included policies reflecting the importance of Special Landscape Areas such as Dodnash SLA.</p> <p><u>ANON-TK46-6MM4-D</u> Tendring DC local plan documents have for many years referred to a widely held aspiration for an extension to the SC&H AONB within the district. However unless the area is designated AONB, Tendring DC can in practice place no more weight on their conservation and enhancement than would be the case elsewhere within other the rural parts of the district.</p> <p><u>BHLF-TK46-6MZB-8 (and others)</u>: Appropriate development can be permitted within AONBs. National planning policy as set out in the revised NPPF requires the highest level of protection in relation to conserving and enhancing the landscape and scenic beauty of AONBs and this will assist the relevant LPAs to ensure that development that is permitted within an extended SC&H AONB reflects the national importance of this designation.</p> <p><u>BHLF-TK46-6MMR-B</u>: With specific regard to the Samford Valley, if it is designated, Babergh DC can be expected to continue to exercise appropriate and where necessary robust planning control in seeking to conserve the outstanding value of the landscape in this area whilst seeking to fulfil its responsibilities with regard to encouraging sustainable development.</p>

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	<p>industrial, poorly managed motor traffic as people strive to find some green space away from the urban developments, loss of field boundaries, insensitive use of agro chemicals thereby destroying valuable habitats, external influences such as changes in government policy etc.</p> <p><u>BHLF-TK46-6MMR-B</u>: We really need to protect the countryside character and appearance of the area and we hope adjacent land will not be used for residential development</p> <p><u>ANON-TK46-6M5E-6</u>: Essex is increasingly under threat from overdevelopment</p> <p><u>ANON-TK46-6M5P-H</u> Development protection.</p> <p><u>ANON-TK46-6M56-Q</u>: To be preserved from intrusive buildings.</p> <p><u>ANON-TK46-6M9T-S</u>: An AONB designation would give additional protection from this type of development.</p> <p><u>BHLF-TK46-6MMR-B</u>: Holly Wood in the top left corner of MAP 1 has wild lilly (sic) of the valley which would be under threat if any new building on adjacent land drained into it.</p> <p><u>BHLF-TK46-6MMM-6</u>: To curb unwanted property development that is becoming rife in some areas (sic) outside the proposed local plan.</p> <p><u>ANON-TK46-6MK6-D</u>: it is a very beautiful estuary which would be spoiled (indeed, is being spoiled) by excessive development.</p> <p><u>ANON-TK46-6M55-P</u>: The area of North Essex is coming under increased pressure from housing development on greenfield sites. Many developments, even in sensitive conservation areas are being approved, for example http://www.eadt.co.uk/property/planning-inspector-gives-green-light-to-67-homes-in-mistley-conservation-area-despite-fierce-opposition-1-5404273. It is an opportune moment to protect this area from further encroachment and ensure that future generations can enjoy its natural beauty.</p>	<p><u>ANON-TK46-6M9N-K</u>: With specific regard to Mistley Place Park and the recreation land immediately to the south, the area in question forms a relatively narrow corridor (approximately 0.5km wide at its narrowest), between the existing urban areas of Manningtree and Mistley which Natural England has assessed as not having sufficient outstanding natural beauty to be considered for designation as an AONB. The legislation requires that this test is met prior to any consideration of the desirability of designation.</p> <p>Natural England is aware that there are a number of planning allocations and applications in the immediate vicinity of Mistley Place Park which are likely to intensify this urban context over the foreseeable future. However, risk of development in itself can never provide a justification for designation. Natural England also explored, but ultimately rejected, the scope to 'wash over' the area which it does not consider to meet the natural beauty criterion, in order to include within the proposed AONB extension the area of qualifying land immediately to the south, as explained in our assessment of whether it is desirable to vary the boundary of the SC&H AONB (September 2017).</p> <p>In doing so it was also noted that both the qualifying and non-qualifying land at this location falls within the Manningtree and Mistley Conservation Area under Section 69 of The 1990 Planning (Listed Buildings and Conservation Areas) Act. As such this area is recognised by the Tendring DC as being of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. The area therefore falls within the scope of Tendring DC's policy PPL 8 for Conservation Areas which states that new development within a designated Conservation Area, or which affects its setting, will only be permitted where it has regard to the desirability of preserving or enhancing the special character and appearance of the area. This should ensure appropriate management of this area.</p> <p><u>Conclusion</u></p> <p>The importance of the landscapes within the proposed extensions has been recognised in planning policies contained in the relevant local plans over many years.</p> <p>Natural England's reasons for proposing to extend the boundary of the SC&H AONB are not based upon any adverse judgement of the effectiveness of the</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p><u>BHLF-TK46-6MZB-8</u>: Stops development.</p> <p><u>ANON-TK46-6MDC-K</u>: Area at risk of development and so needs protection.</p> <p><u>ANON-TK46-6M93-R</u>: Designating as AONB will increase the protection of this area from urbanisation with the loss of the natural beauty of both sides of the restuary (sic).</p> <p><u>ANON-TK46-6M94-S</u>: Unspoilt mudflats and saltmarshes should be kept as natural as possible without development intervention.</p> <p><u>ANON-TK46-6M9N-K</u> Given that an external developer is hoping to build on Mistley Place Park it would be good it see it included within the AONB as the housing development would certainly detract from the area, spoiling the view of the northern shore of the estuary and destroying the natural habitats of the area where kingfishers are frequently seen.</p> <p><u>ANON-TK46-6M9T-S</u>: The southern shore is more susceptible (sic) to possible development which is already incurring at Mistley and Manningtree and in the area adjacent to Parkeston Quay.</p> <p><u>ANON-TK46-6MBQ-Y</u>: This uniquely undisturbed should enjoy continued protection against commercial developments.</p> <p><u>ANON-TK46-6M9T-S</u>: The whole of the Stour Estuary is an internationally important site for wading birds and other water fowl especially (sic) in the Winter and this attracts visitors to view the unique wildlife. As such a designation of AONB would help protect it from disturbance and development. There is at present an application for extensive mussel farms on the Stour Estuary, such farming operations could interfere with e the quiet beauty of the estuary and it wildlife. Compared with the Orwell Estuary which is heavily utilised by commercial shipping and leisure craft, the Stour remains unspoilt and quiet and for example no marinas have been developed there which have crowded the beautiful Orwell Estuary. The AONB designation would protect the Stour from possible Marina development which could occur at several sites on the sothern shore.</p>	<p>existing Local Planning Authorities in the areas concerned; nor does Natural England have any desire that AONB designation should 'stop development' as suggested in some responses. These areas have been identified because of their natural beauty, which is in part, a consequence of the good quality planning control exercised over many years by the planning authorities.</p> <p>There is no presumption against development in AONBs. However, in setting out a framework for the achievement of sustainable development, the NPPF requires the highest level of protection in relation to conserving and enhancing the landscape and scenic beauty of AONBs. The NPPF's position with regard to AONBs will assist Babergh and Tendring DCs to ensure that future development that occurs within an extended SC&H AONB reflects the national importance of this designation.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>BHLF-TK46-6MM1-A Lots of AONB areas -great. Then the councils can {<i>analyst's note: 'cannot'?</i>} build all over them.</p> <p><u>ANON-TK46-6M94-S</u>: By designating as an AONB it's natural beauty can be better protected from the damage caused by inappropriate housing developments and man-made intrusions.</p> <p><u>ANON-TK46-6MB6-4</u>: I would also hope that by designating this area as an AONB that future development of housing and windfarms, for example, will be prohibited.</p> <p><u>Objecting to Designation</u></p> <p><u>ANON-TK46-6MDS-3: (CLA)</u> Tendring District Council put additional restrictions on the land south of the Stour in preparation for the reassessment of the boundary some years ago and therefore it could be seen that the area is already sufficiently protected and there is no need to impose further designation as an AONB.</p> <p><u>ANON-TK46-6MDS-3: CLA</u> members' concerns are not unfounded as we have evidence to show that sustainable development is stifled in areas designated as Areas of Outstanding Natural Beauty. This impacts greatly upon the ability of those living in these areas who want to invest in their businesses to deliver increased growth and productivity, adapt to the requirements of modern agriculture, and meet the needs of local communities... Rural development must include some development, which means change. If we stifle change, whether agricultural, diversification, housing, local employment sites, or tourism, then our landscapes will cease to function as economic and social entities, and the associated environmental and landscape contributions will die with them.</p> <p><u>Other comment</u></p> <p><u>ANON-TK46-6M97-V {Stutton PC}</u> We note that the extension carries no presumption against development within the AONB, and we mention this with the recent decision granting permission for 34 houses in Church Road, Stutton, which is within the existing AONB. We trust that any future development proposals within the AONB are giving the necessary amount of weight due by Babergh District Council as the competent authority.</p>	

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
Removal of Permitted Development Rights in an AONB	<p><u>Objecting to designation</u></p> <p><u>ANON-TK46-6MB2-Z</u>: We would loose {sic} our permitted development rights which could be paramount for our farms future.</p> <p><u>ANON-TK46-6M9W-V</u>: Natural England have a complete lack of understanding of how land management operates. Improvements and environmental projects are quite simply profit driven and by removing permitted development rights and generally adding cost and red tape to land managers seriously undermines their ability to fund such projects</p> <p><u>ANON-TK46-6M9W-V</u> {Additional Info sent to Chairman} Also, from a land managers point of view environmental projects are only possible whilst profits from other areas of a business are available but with additional red tape and the removal of permissive rights comes added cost and a reduction in profit.</p>	<p><u>Commentary:</u></p> <p>The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (the 'GPDO') sets out thresholds below which permitted development can occur subject to various limitations and conditions. These are referred to as Permitted Development Rights (PDRs). In some cases a "prior approval" process applies by which local planning authorities exercise control over certain aspects of the permitted development such as design or siting.</p> <p>AONBs along with Conservation Areas, National Parks, the Broads and World Heritage Sites are referred to as 'Article 2(3) land' within the GPDO. Schedule 2 sets out the PDRs which are excluded from Article 2(3) land including AONBs in England or where restrictions to specific PDRs apply in such areas.</p> <p>Minor amendments to some PDRs have occurred subsequent to the GPDO 2015 and certain PDRs only continue for a limited period of time. There are relatively few instances where PDRs are withdrawn within AONBs and these do not relate directly to the running of farm businesses: for example the installation of electronic communications apparatus; temporary use of land for petroleum or minerals exploration and for stand-alone wind turbines on domestic premises.</p> <p>It is important to note that Local Planning Authorities can tailor Permitted Development Rights to their own local circumstances and may expand PDRs via a Local Development Order or Neighbourhood Development Order; or withdraw PDRs via an Article 4 direction.</p> <p>The withdrawal of specific PDRs from Article 2(3) land does not mean that no development can be allowed, but that it must be tested via the standard planning application process to enable impacts on the AONB to be fully considered. It would be for the local planning authority to determine such development proposals in line with relevant policies in the development plan and other material considerations.</p> <p>The withdrawal of certain PDRs is unlikely to impact on the viability of farm businesses. Indeed, the revised NPPF (para 83) is supportive of the development and diversification of agricultural businesses and AONB designation may present additional opportunities e.g. for tourism.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
		<p><u>Conclusion:</u> With the exception of the listed exclusions and restrictions, which are relatively limited and do not relate directly to the running of farm businesses, PDRs generally apply equally within AONBs as elsewhere. Where PDRs have been withdrawn the standard development management process applies. The PDRs that are withdrawn within AONBs are withdrawn in the context of the statutory AONB purpose, namely the conservation and enhancement of the natural beauty of the area. The restriction on PDRs does not prevent approval of the types of development affected, but it does provide an opportunity for local authorities to fully consider proposals and ensure that such developments take into account the special qualities of the AONB, in line with planning policy. This adds weight to the desirability of designating the Extension Areas.</p>

4.10 Analysis of Qualitative Responses re. Desirability of Designation: Other Issues which go beyond desirability of designation

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
<p>The Government's 25 Year Environment Plan</p>	<p><u>Supporting designation</u></p> <p><u>BHLF-TK46-6MME-X</u> {Suffolk CC} It is considered that this request to consider further evidence consistent with the stated aim of the Government's recently published 25 year Environment Plan, to protect and enhance the natural environment.</p> <p><u>BHLF-TK46-6M9D-9</u> {SC&H Partnership} The Partnership notes that the Government's 25 Year Environment Plan, published in March 2018, says Under Section 2 'Conserving and enhancing natural beauty' that the Government will consider: '.....how designated areas are financed, and whether there is scope for expansion'. This would seem an excellent opportunity to deliver that aspiration at the earliest possible opportunity.</p> <p><u>ANON-TK46-6MMH-1</u>: The proposed extension will be one element that helps to make a reality the present Government's stated intentions, as set out in the recently published 25 Year Environment Plan, to leave the environment in a better state at the end of this period. Increasing the extent of Protected Landscapes such as AONBs is one strategy for promoting this outcome.</p>	<p><u>Commentary:</u></p> <p>AONBs feature prominently in the Government environment plan "A Green Future: Our 25 Year Plan to Improve the Environment" published in January 2018. Chapter 2: 'Recovering nature and enhancing the beauty of landscapes', makes a firm commitment to conserve and enhance the natural beauty of our landscapes by reviewing National Parks and Areas of Outstanding Natural Beauty (AONBs) for the 21st century, including assessing whether more may be needed. The proposed extension to the SC&H AONB, if confirmed, would provide further tangible evidence of this commitment.</p> <p>Government's commitment to natural beauty and landscape designations is also highlighted by the announcement in May 2018 of a review to be led by Julian Glover to 'explore how access to these beloved landscapes can be improved, how those who live and work in them can be better supported, and their role in growing the rural economy'.</p> <p><u>Conclusion:</u></p> <p>The proposed extension to the SC&H AONB, if confirmed by the Secretary of State (Defra), could provide further tangible evidence of government's commitment to natural beauty and national landscape designations.</p>
<p>Impact on the economy</p>	<p><u>Supporting designation</u></p> <p><u>BHLF-TK46-6MMP-9</u> Essex CC: The inclusion of new areas which have been identified as being of AONB quality, into the SCH AONB are welcomed as they will bring new opportunities for conserving and enhancing the natural beauty of landscapes in Essex (as well as Suffolk). There is also the potential for there to be related economic and employment benefits within the extended areas.</p>	<p><u>Commentary:</u></p> <p>From a legislative perspective the wider social and economic impacts of designation are only directly relevant to the decision whether it is desirable to designate in so far as they relate to the conservation and enhancement of the area's natural beauty. However, there is considerable evidence that designation is not detrimental to the local economy or to employment but on the contrary can provide an economic stimulus.</p> <p><u>BHLF-TK46-6MMP-9</u> The draft SC&H AONB places considerable emphasis on the importance of the economy within the designated area and on the economic benefits that can accrue from designation. More broadly</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p><u>ANON-TK46-6MKV-D</u> The social and economic benefits gained by the Suffolk Coast and Heaths AONB area over the last 10 or more years have been significant. Extending the gains elsewhere must be worth doing.</p> <p><u>ANON-TK46-6MDC-K</u>: There is very limited local employment and aonb would provide vital boost to incoming tourism.</p> <p><u>ANON-TK46-6MDF-P</u>: As well as giving protection to important wildlife and views AONB would have economic benefits for the area.</p> <p><u>ANON-TK46-6M93-R</u>: Designating as AONB will increase the protection of this area from urbanisation with the loss of the natural beauty of both sides of the estuary (sic). This will support the local economy through increased tourism and recreational uses, this in turn will support the various settlements in the area and allow younger residents to continue living and working in the areas.</p> <p><u>ANON-TK46-6M93-R</u>: Any improvement to the economies on the South side of the estuary will benefit the economies of the settlements there whereas concentration is often afforded to areas such as Clacton.</p> <p><u>ANON-TK46-6MBM-U</u>: I think that AONB designation will help to support the town of Manningtree, encourage visitors and help to prevent 'dormitory town' stagnation.</p> <p><u>Objecting to designation</u></p> <p><u>ANON-TK46-6MDS-3</u>: CLA {Designation} not only threatens the long term sustainability of the individual farms or businesses, but also adversely affects employment opportunities in these rural areas. In addition to these direct economic factors, unintentional consequences could threaten the viability of local communities and the management of the very landscape and environments deemed attractive enough by Natural England for additional designation.</p> <p>The CLA has long promoted the need to take a balanced approach to “sustainable development” and its three pillars – economy, community, and environment, and this is no less important for our landscapes. The future of</p>	<p>responsibility for the management of AONBs falls under the ambit of the relevant local authorities which themselves have a duty to foster economic and social wellbeing. This local authority duty applies within AONBs just as it does elsewhere.</p> <p><u>Conclusion</u>:</p> <p>Natural England does not agree that AONB designation threatens the long term sustainability of the individual farms or businesses or adversely affects employment opportunities in these rural areas for the reasons set out above.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>our landscapes and the economic success of our rural areas are inextricably linked. A well-managed landscape enriches the nation’s heritage, but is also an attractive backdrop for the much-needed inward investment and tourism and leisure activities.</p> <p><u>Other</u></p> <p><u>ANON-TK46-6MBS-1</u>: It may be appropriate to consider the wider social and economic benefits of designation.</p>	
Impact on businesses	<p><u>Supporting designation</u></p> <p><u>ANON-TK46-6MZH-E</u>: At the weekends there are many walkers which bring trade to our community shop and two pubs.</p> <p><u>Objecting to designation</u></p> <p><u>ANON-TK46-6MDS-3</u> {CLA} As stated on gov.uk, when considering whether an area should be designated Natural England should consider whether “the benefits to the area are greater than the costs of the designation”. There is however no evidence that any consideration has been given to the costs or negative impacts a designation may have on rural businesses and landowners. Instead the various assessments focus solely on the positive impacts a designation might bring. As noted above, there is evidence to show that designations can be costly for local businesses and rural economies, particularly in terms of development and the subsequent social impacts. A thriving rural economy pays for conservation and landscape. Profit is the essential driver of a growing economy in rural areas, underpinning the environment people want, their social goals, jobs and shops for the community. In these areas, landowners and farmers are responsible for existing conservation and land management.</p> <p>They are particularly concerned that investment in their farming businesses, or delivering handfuls of affordable housing for local people will be significantly undermined if the designation is confirmed. This not only threatens the long term sustainability of the individual farms or businesses, but also adversely affects employment opportunities in these rural areas. In addition to these direct economic factors, unintentional consequences could threaten the viability of local communities and the management of the very</p>	<p><u>Commentary:</u></p> <p><u>ANON-TK46-6MDS-3</u> The concern expressed in this response with regard to the impact of designation on business is the perception that there are burdens or drawbacks arising from AONB designation. These perceptions are unwarranted and are not supported by objective evidence. Confirmation of a legal Order varying the boundary of the SC&H AONB would not impose any new burden on business or agriculture, nor widen the expansion of regulatory activity with the possible exception of the withdrawal of some PDRs which is covered above. Local Authority functions are strictly limited with regard to their AONB responsibilities and do not represent an increase in regulation. The concerns expressed by the CLA on behalf of its members relate to the planning system and these are addressed in response to comments with regard to the Town and Country Planning elsewhere in this Table.</p> <p>A further consideration is the positive impact that spending within an AONB can have on the local economy. As with all such spending, this has a positive multiplier effect on the local economy. Although the prime function of public sector spending within an AONB is to deliver its statutory purpose, an indirect and important consequence is to provide a financial benefit for local businesses and communities, for example by employing local contractors. AONBs also attract other external grants and income which benefit local businesses and communities.</p> <p><u>Conclusion:</u></p> <p>Natural England does not agree that AONB designation threatens the long term viability of businesses or adversely affects employment opportunities in</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>landscape and environments deemed attractive enough by Natural England for additional designation.</p> <p>Natural England and the subsequent designations it has the discretion to impose must have regard to the changing nature of rural businesses both now and more importantly in the future when the additional challenges of global food and environmental security will without doubt lead to further land use changes. An AONB designation assessment will reflect the state of the land at a given point in time so it is unfortunate to see such a designation being used by local authorities to, in effect, prevent land managers from developing their businesses to meet current and future needs. A land manager takes appropriate decisions on the use of his/her land based on a number of factors, not least changing market forces. These changes may well dictate a change of land use or decision to develop an area of land or change the use of an existing building.</p>	<p>these rural areas. On the contrary designation can provide a stimulus to some business enterprises, notably but not solely in the tourism and recreation sectors, as considered further below.</p>
Impact on agriculture	<p><u>Objecting to designation</u></p> <p><u>ANON-TK46-6MDS-3</u> Natural England and the subsequent designations it has the discretion to impose must have regard to the changing nature of rural businesses both now and more importantly in the future when the additional challenges of global food and environmental security will without doubt lead to further land use changes. An AONB designation assessment will reflect the state of the land at a given point in time so it is unfortunate to see such a designation being used by local authorities to, in effect, prevent land managers from developing their businesses to meet current and future needs. A land manager takes appropriate decisions on the use of his/her land based on a number of factors, not least changing market forces. These changes may well dictate a change of land use or decision to develop an area of land or change the use of an existing building.</p> <p><u>ANON-TK46-6MDS-3</u>: A number of CLA members, who together own and manage a third of the total land included in the proposed Stour Estuary Extension area and the significant majority of the farmed land, do not agree that the area meets the natural beauty criteria and therefore do not believe the designation process should be taken any further. As the individuals who</p>	<p><u>Commentary:</u></p> <p>AONB designation does not add any new regulatory restrictions on the way land is farmed and is in no way comparable to other land designations (such as Nitrate Vulnerable Zones). Local authorities have no more say over how land is farmed within an AONB than it does in the wider countryside.</p> <p>The lack of impact on agricultural regulation is evidenced by the 2011 Report of the Farming Regulation Task Force, 2011. This Report contained approximately 200 recommendations for cutting ‘unnecessary bureaucracy’ in farming. None of these recommendations related to AONBs.</p> <p>Local Authorities do not have powers to direct activity, nor specifically to restrict use of private or public land in AONBs. They cannot for example compel a particular type of business activity or land use on farmland. They may however make byelaws to regulate public behaviour and prevent damage to land where the purposes of designation may be undermined. A Local Authority cannot constrain Common or other established legal rights and powers as a consequence of designation as AONB. Local Authorities can only work on land with the permission of the landowner (apart from in certain specific situations such as repeated refusal by a landowner to remove</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>will be most greatly impacted by the designation, their views should be given significant weighting.</p> <p><u>ANON-TK46-6MB2-Z</u> {Ragmarsh Farm} Please seriously consider all we have said and I hope you will see that putting our whole farm (the only whole farm in your proposed new AONB) is not in the interest of us, our future farming generation or the AONB and all it stands for.</p> <p>Although we can appreciate the need for AONB areas, we cannot see how you can put a whole busy farm that has 3 dependant families, in this proposed new area. Farming is about diversification and we can only see that AONB will have massive restrictions and discrimination against us as AONB is about preserving and mothballing areas to protect them from change, but farming is about growth and modernisation. Farm machinery is only getting bigger and with theft so high these days, barns will inevitably have to be built but this would go in complete opposites to the AONB wishes.</p> <p>In the event of our farm borrowing money from the banks, they will look at our assets worth and with having a constraining AONB hold, our farm will be devalued, which is wholeheartedly unfair. Does this seem fair to you?</p> <p><u>ANON-TK46-6MBT-2</u>: I am concerned that you are going to devalue our farm by up to a million pounds as with an aonb come heavy restrictions. Farmers are heavily reliant on diversification 4 out of 5 farmers have diversified us included. Many Farms look to tourism however any caravan sites, glamping sites etc. will find it impossible to get past planning once an aonb is in situ. Solar Farms and Wind turbines are another source of income for farmers but are again impossible to gain planning for . All Farm Buildings that are classed as permissible development for residential will be decalcified for example this all has major repercussions for a small farm trying to progress in such a volatile marketplace. If you asked any farmer weather he would choose to buy inside or outside an aonb based on the farms being identical in size, grade and price he would always choose to buy outside as an aonb will come with restrictions. Once an aonb is passed who knows what restrictions will be implemented further down the line and its no good saying they wont because its already happened il use a solar farm as an example. who's to say planning wont be granted on an indoor or outdoor sow unit on the levels of sight and noise pollution . Or that you cannot plant a hedgerow or an orchard in 10 15</p>	<p>an obstruction from a public right of way which would be the case regardless of designation).</p> <p>Most of their work is therefore done by agreement (sometimes with financial incentives) or by advising and persuading another to act. There should therefore be no reason for any landowner or business to change their current land use or other business activity as a consequence of designation.</p> <p><u>Conclusion:</u> Natural England does not agree that AONB designation threatens the long term sustainability of the individual farms or businesses.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>years time as the governing bodies are trying to protect a view that never existed in the first place.</p> <p>The Proposed boundary should not affect the working lives of farmers or businesses or their assets the boundary should be set on crown land public owned spaces or trusts such as Stour Wood etc {sic} or private dwellings and not working farmland.</p> <p><u>ANON-TK46-6MB7-5</u>: All of the Area in Bradfield north of Harwich rd is man made with all trees, hedges and ditches removed for modern economical food production. It is ideal for agricultural diversity and diversification such as outdoor pig production with wide open spaces such land is valuable to such a unit as its free draining soils for rain water and sizeable fields for large numbers of pig arcs. There is also already grazing to let on the Farm for Horses and Diy livery and this is something that will be expanding due to the high demand in this area with light free draining soil avoiding overwintered poaching from the horses, with grazing individual horse's comes small paddocks that are divided by electric fence tape.</p> <p>An act like this will devalue Ragmarsh farm of 350 acres by over a million pounds as it stands but this does not affect the persons making the decision people changing our livelihood and stripping the value of our assets should pay compensation to those who they affect financially.</p>	
Impact on tourism	<p><u>Supporting designation</u></p> <p><u>BHLF-TK46-6MME-X</u> Suffolk CC: the tourism industry in the Suffolk Coast & Heaths AONB is worth £155M per year and supports 3,199 full time equivalent Jobs (4,375 actual jobs) on 2015 figures. The tourism industry is a significant economic driver in the AONB.</p> <p><u>ANON-TK46-6MKN-5</u> The Stour estuary is an extremely beautiful stretch of water attracting an abundance of natural wildlife along with tourists that visit to take in the natural surroundings.</p>	<p><u>Commentary:</u></p> <p>With specific regard to outdoor recreation and tourism, a report "The Economic Impact of Outdoor Recreation in the UK: The Evidence" (Sport and Recreation Alliance & Liverpool John Moores University date) provides evidence about the extent of the contribution of outdoor recreation to the visitor economy. It concludes that this is closely linked to the level of ease with which individuals can engage with the natural environment. AONB designation can significantly contribute to facilitating people's engagement in the natural environment through the types of initiatives that are set out in the AONB Management Plan.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p><u>ANON-TK46-6MDC-K</u>: There is very limited local employment and aonb would provide vital boost to incoming tourism.</p> <p><u>Other</u></p> <p><u>ANON-TK46-6M54-N</u> The whole triangle is already a holiday destination for any ramblers and birders.</p>	<p><u>BHLF-TK46-6MME-X</u> In relation to the evidence provided by Suffolk CC, the Monitor of Engagement with the Natural Environment system (MENE), collects information about visits to the natural environment. This includes the type of destination, the duration of the visit, mode of transport, distance travelled, expenditure, main activities and motivations and barriers to visiting. The survey also collects information about other ways that people engage with the natural environment, such as watching wildlife and volunteering.</p> <p>Although the survey does not include 'holidays' it does include visits or excursions taken from a holiday base. The survey collects details of visits to the natural environment for days out to the coast and its results include the following:</p> <ul style="list-style-type: none"> • 75% of the adult population visit the natural environment at least once a month and therefore could be considered regular visitors • 55% of the adult population visit the natural environment at least once a week and therefore could be considered frequent visitors. • total spend was estimated to be £21 billion and incurred in just over a quarter (27%) of visits. <p>Natural England has analysed existing data in more detail in order to provide a better understanding of how money is spent during visits to the natural environment. This estimated that the total value of outdoor recreational visits to England is £32 billion when <i>MENE</i> figures are combined with data on overnight visitor spending and international tourism spending.</p> <p><u>Conclusion:</u></p> <p>Natural England supports the view that AONB designation can provide a significant economic impetus and help stimulate tourism related income and employment.</p>
Impact on communities	<p><u>Supporting designation</u></p> <p><u>BHLF-TK46-6MME-X</u> Suffolk CC: The extension of the AONB is fully compatible with the need to promote the growth of sustainable and prosperous communities.</p> <p><u>Other</u></p>	<p><u>Commentary:</u></p> <p>The membership of the SC&H AONB Joint Advisory Committee includes all the local authorities with land in the AONB. Fostering the social well-being of local communities is an important function of local authorities and is a function that applies equally within an area designated as an AONB.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p><u>ANON-TK46-6MBF-M</u>: Most importantly to consider the people who live here.</p>	<p>This is reflected by the objectives set out in the current draft SC&H AONB Management Plan which include:</p> <ul style="list-style-type: none"> - supporting economic wellbeing, - health and social wellbeing - promote understanding and enjoyment. <p>Furthermore, the SC&H AONB is very successful in attracting external grants and income which benefit local businesses and communities, an example of which is their levering-in of funding for community-based funded projects such as via the Amenity and Accessibility Fund (AAF) set up by EDF Energy and the Galloper Wind Farm Fund (GWFF) and the Community and Conservation Fund (CCF) developed in partnership with local businesses which raise money on behalf of the AONB.</p> <p><u>Conclusion:</u></p> <p>Natural England agrees that AONB designation is fully compatible with the promotion of the growth of sustainable and prosperous communities.</p>
<p>Impact on housing</p>	<p><u>Objecting to designation</u></p> <p><u>ANON-TK46-6MDS-3</u>: CLA members are concerned that the designation of the proposed areas will mean tighter restrictions on any future development that comes with AONB designation. They are particularly concerned that investment in their farming businesses, or delivering handfuls of affordable housing for local people will be significantly undermined if the designation is confirmed.</p> <p><u>ANON-TK46-6MB2-Z</u> {Ragmarsh Farm –add info} With 5 small children living on this farm now, they will one day want to live on this farm in their own home but with a AONB restraining order, we shan't be able to put in planning permission for either a new home for them or even convert an old pigsty/barn. This seems very unjust to us.</p> <p><u>BHLF-TK46-6MMB-U</u>: The boundary winds around every potential development taking place and proposed in East Bergholt (Mill Road 78 house development), East End (Manor Farm proposed 15 house site), Brantham (houses built along A137) and Bentley (Garden Centre development site and</p>	<p><u>Commentary:</u></p> <p><u>ANON-TK46-6MDS-3</u>: With specific reference to housing, there is no presumption against development for housing within an AONB and the same planning policies and approaches apply here as elsewhere.</p> <p>At the core of the National Planning Policy Framework is the establishment of a presumption in favour of sustainable development. Within this context, the NPPF seeks to stimulate growth, with a particular emphasis on meeting housing need and supporting economic development. The principles within the NPPF aim to provide a balanced but positive approach to meeting the needs of communities within all areas, including those in AONBs and in other sensitive environmental contexts.</p> <p>Location and scale of new housing developments</p> <p><u>BHLF-TK46-6MMB-U</u>: Natural England has taken account of the location, scale and character of existing settlements in assessing the natural beauty of the area. We have also considered development proposals that currently under construction, or have either been approved or are likely to be in the</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>adjoining field) which is going to impact on the proposed area, down grading it to no specific beauty. I would strong (sic) argue that the Samford Valley Extension west of A137 should not be included at all.</p>	<p>context of local plan policies. In practice much of area proposed for designation in the Samford Valley is already recognised as a high quality landscape by Babergh DC through its designation as a Special Landscape Area and this has influenced the location and scale of new housing developments locally.</p> <p><u>Conclusion:</u> Natural England does not consider that local authorities in undertaking their planning management responsibilities will be required to alter their position with regard to housing in rural areas as a consequence of AONB designation.</p>
<p>Importance of the areas for recreation, understanding and enjoyment</p>	<p><u>Supporting designation</u></p> <p><u>ANON-TK46-6M9N-K</u> 1st Lawford Scout Group welcomes the proposed extensions to the AONB because as leaders we are becoming increasingly concerned at the loss of suitable local countryside in which our young people can develop their appreciation of the natural world. Outdoor activities have always played a huge part in the training and development programmes of the the Scout Association and indeed the new programme requires 60% of all training should be undertaken outside. As a consequence of this more and more trips are being made into to the local area to learn new skills, become aware of the natural world and thus learn more about themselves and other people. We are very fortunate in Lawford to have such richness on our doorstep but we are finding that groups from Colchester District are asking to use our HQ as the new housing developments are destroying the fields and woods which they previously used.</p> <p>The Stour estuary provides great opportunities for our many young members to begin to understand the world around them, caring for their environment and the effects of its mis-management. The local nature reserve wardens are very helpful in this respect and a good working relationship has been established over the years. As leaders we try to inculcate a pride in the area where they live and to have the extension to the AONB would certainly help to foster this. This is a proposal for the future but as a Group involved with young people we certainly hope that it is accepted and that their future environment will be protected for many, many years to come.</p>	<p><u>Commentary:</u> Direct public benefit from the designation of the proposed extensions would derive from the potential for improved opportunities to enjoy the scenic beauty of the area from existing rights of way and from the opportunity this could afford for an increased understanding of its special qualities. The extension of the AONB in this area could enable further enhancement of these existing access opportunities if deemed appropriate and with the agreement of the landowners.</p> <p>Although AONBs do not have the second statutory purpose ascribed to National Parks (ie promoting understanding and enjoyment of its special qualities by the public), it is apparent that activities designed to help people understand and enjoy the special qualities of the SC&H AONB are a very high priority locally, as reflected within the AONB Management Plan.</p> <p>The long term Vision Statement (to 2038) set out in the draft Management Plan includes the aspiration that ‘local communities are passionately and actively engaged with their environment’. The AONB team undertake very many activities designed to develop understanding and enjoyment of the SC&H AONB’s special qualities and is well placed to do likewise within the Stour estuary proposed extension area.</p> <p><u>ANON-TK46-6M9R-Q:</u> Natural England considers that there are sufficient opportunities to appreciate and enjoy the special qualities of the area from the existing network of surrounding roads and from the Public Rights of Way</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p><u>ANON-TK46-6M9H-D</u>: We need to protect such beautiful areas for people to enjoy.</p> <p><u>ANON-TK46-6M9Z-Y</u>: As above it needs to be protected but also promoted as an area to appreciate.</p> <p><u>ANON-TK46-6MDW-Z</u>: perhaps of equal importance, it is an area that can be viewed freely by everyone who so wishes. If "beauty is in the eye of the beholder" the eye has to have the opportunity to behold!</p> <p><u>BHLF-TK46-6MZV-V</u>: Regarding the fence at Mistley Way. Including to blocks at Bradfield shore. I personally would say yes but I am personally concerned about the above and Tickets placed on people (sic) boats to be removed this had been enjoy along Mistley Walls for years (sic).</p> <p><u>ANON-TK46-6M5X-S</u> As a keen walker in this area I feel it is essential to protect footpaths and other access routes to encourage people to walk and also to bring visitors to this part of Essex.</p> <p><u>ANON-TK46-6MBQ-Y</u> Recognition and Extension of Recreational areas</p> <p><u>ANON-TK46-6M5X-S</u>: The views are wonderful and are home to wlldlife and gives access to physical activities.</p> <p><u>BHLF-TK46-6MZW-W</u>: Very good walking country.</p> <p><u>ANON-TK46-6M9U-T</u>: The area has particularly beautiful views and it is good for walking.</p> <p><u>ANON-TK46-6MB5-3</u>: Just walking there explains all.</p> <p><u>ANON-TK46-6MBM-U</u>: The south bank of the Stour Estuary has a lot of potential for outdoor amenity and tourism which could be managed to help maintain the natural beauty of the area.</p> <p><u>ANON-TK46-6M5E-6</u>: Improve access to the area e.g. by better rail and bus links (for example more bus services connecting with trains at Manningtree)</p>	<p>that cross the area, adding weight to the public benefit that could be derived from designation.</p> <p><u>ANON-TK46-6M9W-V</u>: Natural England does not agree that the special qualities of the Samford Valley are 'limited' or that there would be no benefit to the public if this area was designated as an extension to the SC&H AONB.</p> <p><u>ANON-TK46-6M9R-Q & ANON-TK46-6M9W-V</u>: The statement that there are no Public Rights of Way (PRoW) within the Samford Valley is incorrect. There are six PRoW which cross this proposed extension. Nor is it correct to state that 'there are no views into the valley', the fringes of the valley can be seen from many places around its rim and its secluded, hidden quality is part of the charm of the area.</p> <p>Whilst it is acknowledged that some small areas of valley bottom may not be visible from the PRoW network, and that there are no further rights of way crossing the valley floor west of Hustlers Grove, the majority of the area can be seen and appreciated from publically accessible locations.</p> <p>The land included within the proposed extension is largely confined to land with a clear visual association with the Samford Valley, containing the valley floor and slopes of the river valley to the break of slope to the surrounding plateau. There is therefore strong intervisibility along much of the valley both from the surrounding lanes along the valley rim and from the PRoW and roads which cross it, offering significant opportunities to appreciate the quiet solitude and natural beauty of the area.</p> <p>The valley slopes in this area play an important role in the interesting and attractive landforms visible from the PRoW crossing the northern valley slopes near Hill Farm. The upper valley slopes are also visible from Cutlers Lane alongside the valley rim, offering glimpses of small irregular pastures and a range of habitat textures and colours south-west of Chaplain's Farm which lift the natural beauty of the area above that of the wider surrounding plateau landscapes.</p> <p>As noted in the assessment of natural beauty, the particularly complex winding morphology of the upper valley slopes draws one in to explore the hidden areas below the plateau rim or around the next bend in the footpaths</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>so people do not have to drive and clog up roads and car parks on the AONB when they visit which will detract from the natural beauty.</p> <p><u>ANON-TK46-6M5X-S</u>: Artistic, natural history and good walking terrain for all about lies.</p> <p><u>ANON-TK46-6MKA-R</u>: keep it accessible to all residents and visitors.</p> <p><u>ANON-TK46-6MKK-2</u>: The walks along the Stour are some of the best in the Essex/Suffolk counties.</p> <p><u>BHLF-TK46-6MDX-8</u>: The land south of School Lane, known as Pattles Fen or the Millennium Wood and run by the Woodland Trust is a wonderful asset within a large village. The rest of the area, the Samford Valley & Dodnash has an extensive network of footpaths that should be enhanced by inclusion within the AONB.</p> <p><u>ANON-TK46-6MMH-1</u>: I welcome the proposed inclusion of the area at the northern edge of Brantham, which takes in The Woodland Trust property of Pattles Fen. Although relatively small in extent, the woodland, fen and lichen heath habitats accessed by paths and boardwalk are a welcome element of the natural capital of the village and enjoyed by many people.</p> <p><u>BHLF-TK46-6MZW-W</u>: I'll walk there with pleasure.</p> <p><u>ANON-TK46-6M94-S</u> Proposed boundary is within the main roadways that provide access to the Shotley peninsula with existing public rights of way offering good access for all.</p> <p><u>Objecting to designation</u></p> <p>ANON-TK46-6MB7-5 (BI and Je Mitchell and sons Response): There are already open footpaths from Bradfield in all directions and including paths already along the river bank and the road to the river. Its already a Nature zone with strict planning rules in place to protect the scenery.</p>	<p>forming attractive compositions of crossing and converging slopes. This hidden, winding characteristic is one of the great charms of the area.</p> <p>Natural England's assessment of natural beauty concluded that there is a considerable weight of evidence in relation to tranquillity, landscape and scenic qualities, and evidence in relation to cultural and natural heritage. It is also apparent that these qualities can be appreciated and enjoyed from publically accessible locations. The extension of the AONB in this area could enable further enhancement of these existing access opportunities if deemed appropriate and with the agreement of the landowners.</p> <p><u>BHLF-TK46-6MDX-8</u>: Pattles Fen has been included within the proposed extension due to its inherent wildlife and landscape value as well as the opportunities it provides for people to enjoy and appreciate these qualities.</p> <p><u>Conclusion:</u></p> <p>The assessment of natural beauty concluded that there is a considerable weight of evidence in relation to tranquillity, landscape and scenic qualities, and evidence in relation to cultural and natural heritage. It is also apparent that these qualities can be appreciated and enjoyed from publically accessible locations. The extension of the AONB in this area could enable further enhancement of these existing access opportunities if deemed appropriate and with the agreement of the landowners.</p> <p>Natural England recognises the important role played by the SC&H AONB in working to increase understanding and enjoyment of the AONB's special qualities and that the skills and experience developed in doing so would be brought to bear within the proposed extension areas following confirmation.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p><u>ANON-TK46-6M9R-Q</u>: Mark Westwood Agent: Much of the area cannot be seen, there are no public right of way, no views into the valley, so there is no benefit to the public.</p> <p><u>ANON-TK46-6M9W-V</u>: Also the area is very limited and in many cases cannot be seen, therefore is of limited benefit.</p> <p><u>Other</u></p> <p><u>ANON-TK46-6MZF-C</u> We would be concerned with any restriction to sailing that might result the designation.</p> <p>We believe that sailing is compatible with conservation and causes little disruption to wildlife. In fact, the responsible use of East Coast rivers by sailing craft adds to their aesthetic appeal. Unlike the Orwell, the Stour is little used for recreational sailing. Rivers that are not used at all are like derelict buildings.</p> <p><u>BHLF-TK46-6MZV-V</u> I am all for Outstanding Natural Beauty regarding the Stour but as Natural England was involved with ? block at Bradfield Shore Lane. I have many FOI and in my view this has never been adhered to. Therefore I wouldn't want to see that boat owners are driven away from Mistletoe Walls as this has been an enjoyment for years.</p>	
<p>Importance of the three proposed extension areas for health, wellbeing, and spiritual refreshment</p>	<p><u>Supporting designation</u></p> <p><u>ANON-TK46-6MB1-Y</u> Please do expand these beautiful areas. Many people rely on them to find peace and healing from the stress of modern life.</p> <p><u>ANON-TK46-6MBW-5</u> People need green and blue spaces for their wellbeing.</p> <p><u>ANON-TK46-6MKN-5</u> In an increasingly crowded world we need to protect these areas for the benefit of both locals and visitors can continue to enjoy them.</p> <p><u>ANON-TK46-6M9N-K</u>: The consultation document notes that it is a dynamic landscape with its ever changing patterns of light, atmosphere and noises</p>	<p><u>Commentary:</u></p> <p>The demonstrable and positive impact that 'cherished landscapes' can have on mental health is recognised in the SC&H AONB draft Management Plan 2018 -2023. Section 2.5 of the Plan covers Health and Social Wellbeing and makes reference to the excellent recreational opportunities within the existing AONB which can support healthier lifestyles as well as to the opportunities to volunteer for environmental and societal projects which can also support good mental health and engender community spirit.</p> <p><u>Conclusion:</u></p> <p>Natural England recognises and appreciates the positive role that AONBs can play in providing a range of physical and psychological benefits for people alongside other benefits for natural beauty and biodiversity. The SC&H AONB is no exception and there are numerous examples of the range</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>which constantly stimulate the senses giving feelings of harmony and peace which can only be derived from the natural environment.</p> <p><u>ANON-TK46-6M5E-6</u>: extending the Stour Valley AONB will help conserve more of the landscape for people to get out in and enjoy.</p> <p><u>BHLF-TK46-6MZM-K</u>: Good for wellbeing just to be in it and view it.</p>	<p>of activities which contribute to the health and wellbeing of people which are provided under the auspices of the AONB Team. It is reasonable to expect that if the Stour estuary proposed extension is confirmed then such benefits where appropriate and feasible will also accrue to local residents and visitors in these areas.</p>
<p>Extent that the costs and benefits of designation have been considered by Natural England</p>	<p><u>Objecting to designation</u></p> <p><u>ANON-TK46-6MDS-3</u> {CLA} As stated on gov.uk, when considering whether an area should be designated Natural England should consider whether “the benefits to the area are greater than the costs of the designation”. There is however no evidence that any consideration has been given to the costs or negative impacts a designation may have on rural businesses and landowners. Instead the various assessments focus solely on the positive impacts a designation might bring.</p> <p><u>Objecting to designation</u></p> <p><u>ANON-TK46-6MD6-6</u>: Personally I think it is a lovely area and alongside many others I enjoy the area a great deal, however I think this process is a waste of resources.</p>	<p><u>Commentary</u></p> <p><u>ANON-TK46-6MDS-3</u>The CLA response quotes text that was previously on the Defra website which explained how NE prioritises proposals for new designations which might be considered formally in the future. The text was not intended to refer to the specific responsibilities vested in NE as set out in the Section 82(1) of the CRoW Act which does not allow for analysis of costs and benefits. It is well-established through precedent that a decision cannot be based on a test which is materially different from that contained in the relevant statute.</p> <p>The wording on GOV.UK has now been amended, as it did not make sufficiently clear the difference between the following:</p> <ol style="list-style-type: none"> 1) How Natural England goes about prioritising designation projects and deciding to take a particular proposal forward for formal assessment. A range of factors may be taken into account including the cost to Natural England and the public purse. Natural England is not constrained by legislation in choosing the criteria it uses for this. This is what the now amended text on GOV.UK was referring to. 2) The factors Natural England is required to consider in fulfilling its responsibilities for the designation of AONBs is set out in the CRoW Act 2000. <p>It is important to emphasise that Natural England’s position on the general application of the legislation governing AONB designations is that the specific words of the CRoW Act must be applied. In the simplest possible terms, the consideration of designating land under the CROW Act raises the following questions:</p> <ul style="list-style-type: none"> - Does this landscape have sufficient natural beauty? - Is it desirable to designate this landscape as AONB due to its natural beauty? - Where should the detailed boundary be drawn?

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
		<p>Natural England Guidance sets out an approach to the identification of land meeting the statutory criteria in the s82(1) of the CRoW Act by providing a practical framework for the assessment of land, to provide assistance for consideration of what s82(1) requires. It does not replace or supplement the statutory test in the CRoW Act.</p> <p><u>Conclusion:</u> In discharging its responsibilities under the CRoW Act, NE does not have the discretion to consider whether the benefits to the area are greater than the costs of the designation. The comment is not therefore relevant to NE's consideration of the desirability of designation.</p>
<p>The name of the AONB</p>	<p><u>Supporting designation</u></p> <p><u>BHLF-TK46-6MMP-9</u> ECC fully supports the inclusion of additional areas into Essex as a result of this boundary variation project / consultation, and furthermore considers that the name of the AONB should be amended to reflect this in the Draft Designation Order when submitted to the Minister.</p> <p><u>BHLF-TK46-6MMP-9</u> {ECC} The only areas currently designated in the SCH AONB are in the county of Suffolk, which is reflected in the current name of the AONB. ECC considers that, should additional areas within Essex be included as a result of this boundary variation project / consultation, the name of the AONB should also be amended to reflect this in the Draft Designation Order when submitted to the Minister. ECC would support a change in name of the AONB to the Suffolk and Essex Coast and Heaths Area of Outstanding Natural Beauty.</p> <p><u>BHLF-TK46-6M9D-9</u> The Suffolk Coast and Heaths AONB Partnership note that if any order were to be confirmed that the AONB would include parts of Essex that are not reflected in its current name. The Partnership request that when drafting any order the issue of the name is considered to reflect the new arrangement.</p>	<p><u>Commentary:</u></p> <p>An extension to the SC&H AONB into Essex does not necessitate a name change and Natural England has not proposed changing the name of the AONB. The protection of high quality areas of countryside is not dependent on identifying a particular name for it but on whether it meets the criteria for designation.</p> <p>For example a large area of Cumbria and Lancashire is now in the Yorkshire Dales National Park, following confirmation of a boundary variation Order by the Secretary of State in 2015. This was not accompanied by any change to the name of the designated area, which continues to be the Yorkshire Dales National Park, though the areas which lie in Cumbria are now referred to by the National Park as the Westmorland Dales for branding purposes.</p> <p>If the proposed boundary change is as approved by NE Board in September 2017 and is ultimately subject to a legal Order confirmed by the Sec of State, the SC&H AONB would be increased in extent by less than 10%, with only a part of this increased area being within the county of Essex. A large proportion of the proposed Stour Estuary Extension consists of estuary.</p> <p>Moreover, whatever the name of the AONB, this does not dictate how the area is presented in any promotional material. Where necessary, a nuanced and sophisticated approach to publicity can be taken which allows for matters of local identity to be taken into account.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
		<p>Any consideration of changing the name, following confirmation of a Legal order extending the AONB boundary into Essex would no doubt need to be subject to consultation and detailed consideration by Defra in the future, which would be likely to determine whether there is any benefit to changing what is in effect, an established and well-known local 'brand'.</p> <p><u>Conclusion:</u> That Natural England does not consider a change in the name of the SC&H AONB to be required as a consequence of the boundary variation. The name of an enlarged SC&H AONB may however be a matter for future consideration by the Secretary of State.</p>

Conclusion in relation to desirability of designation.

The consultation demonstrated a clear level of consensus, including from statutory consultees, with regard to the desirability of designating the three proposed extensions collectively as a variation to the Suffolk Coast & Heaths Area of Outstanding Natural Beauty for the purpose of conserving and enhancing the natural beauty of the area. A small number of landowners/ farmers, supported by the CLA, and one housing developer disagreed with this conclusion with regard to parts of the area proposed as a variation to the AONB and generally this was with regard to their own landholding or, on the part of the developer, regarding land adjacent to a current major housing development.

The reasons given for either supporting or objecting to the proposed extensions have been considered in detail by allocating each to themes either relating to relevant questions, set out in approved Guidance, that Natural England considers in determining whether to submit a variation Order to the Minister for confirmation or to themes considered not relevant to this decision.

Natural England remains of the view that it is desirable for the purpose of conserving and enhancing the natural beauty of the area that collectively, it is desirable that the three proposed extensions should be subject to an Order varying the boundary of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty.

4.11 Analysis of Qualitative Responses re. Boundary Considerations for the Proposed Stour Estuary Extension

C5: Is the proposed boundary of the Stour Estuary Extension appropriate?	
Yes	72
No	5
Not sure	17
Suggest new boundary	13

Summary Analysis of Responses

A large majority of respondents (77%) who answered question C5 agreed that the proposed boundary was appropriate. Some respondents (including the statutory consultees) submitted their response by letter or email. It was thus not possible to include their responses in the numeric summary table as they did not actually answer question C5. The figures shown thus appear lower than the actual response rates overall. The overall consensus in non-questionnaire responses was also significantly in favour of designation of the areas within the proposed boundary. In addition to the 13 questionnaire responses, there were 10 further requests in writing to amend the boundary to include more land and 2 requesting the removal of land. In addition, care needs to be applied in

interpreting the analysis figures as not everyone who suggested a change to the boundary stated that the boundary was not appropriate.

Four of the seven statutory consultees indicated their general support for the designation of the proposed extensions including the proposed Stour Estuary extension, but they all requested amendments to the proposed boundary. Tendring District Council did not comment on whether they supported the designation of the land in the proposed extension but they did request the inclusion of additional land. These requests are discussed further below.

The SC&H and Dedham Vale AONB Partnerships also welcomed the proposals to extend the current boundary of the AONB, including the proposed Stour Estuary Extension and indicated their support for the designation of the areas included within the proposals. They also requested the inclusion of additional areas.

A significant number of respondents gave reasons for their views in relation the changes they had requested to the boundary of this area. These were analysed and each theme raised is considered further in the table below with relevant text from responses extracted verbatim under the relevant theme heading.

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
General Agreement /Disagreement with proposed boundary	<p><u>Supporting inclusion of the areas within the proposed boundary</u></p> <p>BHLF-TK46-6M9K-G: Tendring District Council: Suggested Alternative Boundary for Part of the Stour Estuary AONB Extension</p> <p>1. Purpose of the Report To analyse the information contained in the assessment document produced by Natural England relating to landscape and natural beauty qualities of the estuary and land on the southern shore of the Stour Estuary.</p>	<p><u>Commentary</u></p> <p>The general support of the statutory Local Authorities who responded to the statutory consultation for the designation of the areas within the proposed extension boundaries is welcomed. Babergh, Tendring, Suffolk and Essex also requested the inclusion of additional land. The exact areas proposed for inclusion varied between the local authorities, though there was also a degree of consistency in some areas. The evidence supplied in support of these requests is considered further in the relevant theme sections below.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>To review the judgements made in relation to the quality and extent of land contained in the proposed extension of the Area of Outstanding Natural Beauty (AONB) and to set out an alternative boundary that is broadly supported by the evidence contained in the report.</p> <p>2. SCOPE OF REPORT This report relates mainly to Evaluation Area S4 – Head of the Estuary to Mistley with reference to a small area in Wrabness in Evaluation Area 5 – Central Estuary and Southern Slopes. It sets out the reasons and justification for including additional land within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Extension... (Analyst Note: Tendring requested the inclusion of additional land at the Head of the Estuary, at Wrabness and at Mistley Place Park. The detail relating to the 3 areas is included in the relevant theme sections below and not repeated here.)</p> <p>BHLF-TK46-6MMP-9: Essex County Council strongly supports Natural England’s (NE) proposal to extend the boundaries of the SCH AONB in the areas outlined in the consultation. ECC feels there are additional areas, for which there is new evidence showing them to be worthy of inclusion, that should also be considered by Natural England in the Draft Designation Order when submitted to the Minister. (Analyst note, The 3 areas that ECC wish to see included are the same as those given below that the SC&H AONB Partnership consider should be included.</p> <p>BHLF-TK46-6M99-X: Babergh & Mid Suffolk District Council: The Council welcomes the proposal to extend the boundary of the AONB southwards towards Essex and the inclusion of areas with (sic) Babergh... With respect to the focussed Review from LDA Design commissioned by the AONB Partnership the Council supports the recommendations in the report to extend the boundary in Babergh in the following areas: The proposed extension over the intertidal area to the railway line in the Stour Estuary. Consideration should also be made to extend further to include the intertidal area to the northwest of the railway line so that the extension meets the existing boundary of the Dedham Vale AONB along the line of the A137.</p> <p>BHLF-TK46-6MME-X: Suffolk County Council: Suffolk County Council welcomes Natural England’s proposals to extend the boundaries of the SC&H AONB, but it considers that the proposal should be amended prior to the preparation of the draft Designation Order as described in the appendix to this letter (Analysts note, appendix contains extracts from the SC&H AONB partnership response relating to an addition to this proposed extension at: Stour Estuary between Manningtree and Cattawade).</p>	<p>The support of the SC&H and Dedham Vale AONB Partnerships for the designation of the land within the proposed Stour Estuary Extension is also welcomed. They also made suggestions for the inclusion of additional areas. The SC&H AONB Partnership commissioned a report by LDA Design to provide evidence in support of their proposed additions, which formed the basis of their submissions. This evidence is considered below in relation to each proposed addition. The LDA Report also formed the basis for the evidence supplied by the statutory authorities, though there was some variation in the exact areas these wished to see included.</p> <p>Several respondents also made generic comments in support of the boundary line chosen, which are welcomed and three made generic comments requesting changes, but without providing any detail to support their views.</p> <p>Conclusion The consultation demonstrated that there is a significant level of support overall for the inclusion of the land within the proposed boundary of the Stour Estuary extension, though a range of amendments were proposed with varying levels of evidence in support of these proposed changes. The proposed amendments to both remove land and include additional areas are considered further below.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>BHLF-TK46-6MDN-X: Ipswich Borough Council: The Council broadly supports proposals to extend the AONB into the candidate areas and thereby to support the conservation of the area's natural beauty. (Analysts note: They did not request any changes to the boundary of this proposed extension.)</p> <p>BHLF-TK46-6M9D-9: Suffolk Coast and Heaths AONB Partnership: In summary the response of the Partnership is:</p> <ul style="list-style-type: none"> • To welcome the proposals to extend the current boundary of the AONB and • Request that Natural England reviews new evidence for areas that the AONB Partnership consider to be worthy for inclusion in any order to review the AONB boundary... (Analysts note: The areas that the SC&H AONB Partnership consider to be in need of further consideration are outlined below with justification drawn from a consultant's report (LDA Design) commissioned by the AONB team at 1. Wrabness, 2. Manningtree and Mistley, 3. Stour Estuary between Manningtree and Mistley. The justification text for the inclusion of these three additional areas is detailed below in the relevant theme section of the table below and not repeated here in order to minimise repetition. <p>BHLF-TK46-6M92-Q: The Dedham Vale AONB and Stour Valley Partnership response is: To welcome the proposals to extend the current boundary of the AONB... It notes that "the Suffolk Coast & Heaths AONB Partnership has suggested that Natural England look at new evidence procured by the AONB team identifying additional areas that meet AONB criteria. It considers that Natural England should consider adding these additional areas into any order created to revise the Suffolk Coast & Heaths AONB Boundary." (Analyst note The 3 additional areas are detailed in the Suffolk Coast & Heaths AONB Partnership response and not repeated here in order to minimise repetition).</p> <p>ANON-TK46-6M55-P: This would seem to be an appropriate boundary. It is contiguous with the existing AONB which includes only the northern valley sides of the estuary. Together they form a visual landscape unit with a strong estuarine influence. ... This will protect and offer a natural boundary for the rest of the south side of the River Stour, protecting its high quality landscape. To the east, it will protect the important estuaries and ancient woodland up to and beyond Copperas wood... In summary, I am very supportive of the proposed boundary extension of the Stour valley AONB given the area's rich and varied natural beauty, and high-quality landscape.</p> <p>ANON-TK46-6M5R-K: Encompasses the shoreline.</p>	

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>BHLF-TK46-6MZN-M: I agree that as far as possible, you need a clearly defined boundary for an extension. Mostly this is the Essex Way & the B1352 and I think this is very sensible and practical.</p> <p>BHLF-TK46-6MZK-H: The boundary has to be drawn somewhere and I think your proposal is reasonable.</p> <p>ANON-TK46-6MDC-K: Proposed boundary is sensible given location</p> <p>ANON-TK46-6M9T-S: The proposed boundary extension includes the whole of the Estuary and sections of the southern shore but excludes Mistley and Mannigtree (sic) and the docks area at Parkstone (sic). This is a very appropriate designation of the boundary as it covers the visual slopes of the south shore of the Estuary which are most visible from the water and the north shore.</p> <p>ANON-TK46-6MM3-C: It encompasses a large area of Natural Beauty.</p> <p>BHLF-TK46-6MBK-S: I approve of all three extensions to the A.O.N.B.</p> <p>BHLF-TK46-6MDX-8: Although some other areas may have been considered as desirable, I was happy that they had been considered and accept the reasons they have not been included.</p> <p>ANON-TK46-6MMH-1: I support the additional five proposals in the AONB Partnership response dated 17 April to extend the Stour Estuary area beyond the proposed new boundaries.</p> <p><u>Not in support of the proposed boundary but no evidence supplied.</u></p> <p>ANON-TK46-6MD6-6: It is too arbitrary (sic)</p> <p>ANON-TK46-6MDS-3: The boundary should be reconsidered but the CLA has encouraged members in the area to submit their own responses suggesting more appropriate boundaries, as they are the individuals who are best suited to make this important judgement.</p> <p>ANON-TK46-6MBW-5: Make it bigger!</p>	
Inclusion / exclusion of more of the Head	<p><u>Proposed Boundary Amendments</u></p> <p>Include more land at the Head of the Estuary</p>	<p><u>Commentary</u></p> <p>Three different proposed changes to the boundary at the head of the estuary were proposed. These have each been considered in the relevant sub-themes below:</p> <p>Additions</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
<p>of the Estuary to the west</p>	<p>BHLF-TK46-6MMP-9: Essex County Council strongly supports Natural England's (NE) proposal to extend the boundaries of the SCH AONB in the areas outlined in the consultation.</p> <ul style="list-style-type: none"> • ECC feels that there are additional areas, for which there is new evidence showing them to be worthy of inclusion, that should also be considered by Natural England in the Draft Designation Order when submitted to the Minister. • ECC fully supports the inclusion of additional areas into Essex as a result of this boundary variation project / consultation, and furthermore considers that the name of the AONB should be amended to reflect this in the Draft Designation Order when submitted to the Minister. <p>The inclusion of new areas which have been identified as being of AONB quality, into the SCH AONB are welcomed as they will bring new opportunities for conserving and enhancing the natural beauty of landscapes in Essex (as well as Suffolk). There is also the potential for there to be related economic and employment benefits within the extended areas.</p> <p>Essex County Council is aware of and has supported the decision taken by the AONB Partnership to commission its own consultants to review the consultation material to guide not only the Partnership but also the component partners in their own responses.</p> <p>ECC has reflected on the report produced by, and the verbal communications held with, the appointed consultants and other partners, and believes that the additional work undertaken to be robust and this work therefore forms the basis of the ECC response.</p> <p>ECC has taken the decision to fully support the additional areas proposed for inclusion which are outlined fully in the response of the Suffolk Coast and Heaths AONB partnership response (attached in Appendix 2).</p> <p>ECC also supports the inclusion of additional areas highlighted in the last paragraph of the Manningtree and Mistley section of the SCH AONB response (shown here on p 10), in accordance with comments made by Tendring District Council in their response (see Appendix 3). It is requested that Natural England gives further consideration to the inclusion of these additional areas in the Draft Designation Order when submitted to the Minister...</p> <p>Stour Estuary between Manningtree and Cattawade (see SC&H AONB Partnership response below for detail of arguments made.)</p> <p>BHLF-TK46-6M9K-G: Tendring District Council. In terms of the proposed changes to the position of the boundary between Middlebridge Creek and the railway bridges and the area around 'The House for Essex' in Wrabness Tendring District Councils view accords with that set out in the representation from the AONB partnership...</p> <p>In relation to the areas in the westernmost part of the Stour Estuary Evaluation Area and around 'The House for Essex' in Wrabness; that the boundary be</p>	<p>A) Boundary should follow the railway viaduct B) Boundary should adjoin the Dedham Vale AONB boundary at the head of the Estuary</p> <p>Deletion C) Boundary should exclude Town Beach and Stour Sailing Club 'hards'</p> <p>Additions A) Boundary should follow the railway viaduct BHLF-TK46-6MMP-9: Essex County Council, BHLF-TK46-6M9K-G: Tendring District Council, BHL-TK46-6MME-X: Suffolk County Council, BHLF-TK46-6M99-X: Babergh and Mid Suffolk District Councils, BHLF-TK46-6M9D-9: The Suffolk Coast & Heaths AONB Partnership, BHLF-TK46-6MMX-H: The Suffolk Preservation Society, BHLF-TK46-6MMK-4: Stour Sailing Club.</p> <p>Four of the five statutory consultees who responded to the consultation, both AONB Partnerships and two other local groups requested the inclusion of an additional area at the Head of the Stour Estuary. They wished to see more (but not all) of the estuary included towards its head, i.e. as far as the railway viaduct, which they proposed using as a revised boundary across the Head of the Estuary. The respondents quoted the additional evidence supplied in the LDA report commissioned by the SC&H AONB Partnership to justify this proposed addition.</p> <p>Natural England welcomes the fact that the LDA Report considers the proposed boundary variation in this section to be generally well-judged, specifically, in respect of the exclusion of the land either side of the river Stour; and the areas west of the railway viaduct which includes power lines, A137 and sluice.</p> <p>In relation to the LDA proposed addition to include more of the estuary as far as the railway viaduct; this proposed addition was suggested by the same statutory consultees and AONB Partnerships during the informal consultation and was considered again in detail at that time. As stated in the subsequent boundary considerations assessment, use of the railway bridge as a boundary feature was considered during the development of the proposed boundary. Its use would however have required the inclusion of a narrow area of estuary which whilst pleasant in its own right and offering attractive views towards the wider estuary in some places adjacent to Manningtree, is largely bounded on both sides by land with a strong developed nature (industrial estates and derelict land) and hard artificial flood banks, which affect landscape and scenic quality. The area proposed for inclusion was</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>repositioned as suggested in the representation from the AONB Manager on behalf of the AONB Partnership.</p> <p>BHLF-TK46-6M99-X: Babergh and Mid Suffolk District Councils • With respect to the Focussed Review from LDA Design commissioned by the AONB Partnership the Council supports the recommendations in the report to extend the boundary in Babergh in the following areas:</p> <ul style="list-style-type: none"> o The proposed extension over the intertidal area to the railway line in the Stour Estuary. Consideration should also be made to extend further to include the intertidal area to the northwest of the railway line so that the extension meets the existing boundary of the Dedham Vale AONB along the line of the A137. <p>BHL-TK46-6MME-X: Suffolk County Council: Suffolk County Council welcomes Natural England’s proposals to extend the boundaries of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty, but it considers that the proposal should be amended prior to the preparation of the Draft Designation Order as described in the appendix to this letter. This is because the Council considers that there are significant opportunities for Suffolk afforded by the extension of the AONB and that these should be maximised, specifically... The AONB Unit has commissioned a study from landscape consultancy LDA Design, to review the extension proposals put forward by Natural England. This is intended to inform the response of the AONB Partnership and the response individual partners, should they wish to use it. This is the source of the evidence that the Council wishes Natural England to consider. The details are set out in the appendix to this letter... Stour Estuary between Manningtree and Cattawade (see SC&H AONB Partnership response below for detail of arguments made.)</p> <p>BHLF-TK46-6M9D-9: In summary the Suffolk Coast & Heaths AONB Partnership Response is:</p> <ul style="list-style-type: none"> • To welcome the proposals to extend the current boundary of the AONB • Request that Natural England reviews new evidence for areas that the AONB Partnership consider to be worthy for inclusion in any order to revise the AONB Boundary... This work has identified some additional areas that it considers worthy of the AONB designation. The Partnership acknowledge that any additional areas considered following the consultation process may lead to a delay in the designation process. However, the Partnership consider that Natural England should consider this new evidence when making the draft order to extend the designation. The areas that the Suffolk Coast & Heaths AONB Partnership consider to be in need of further consideration are outlined below with justification drawn from a consultant’s report (LDA Design) commissioned by the AONB team... Stour Estuary between Manningtree and Cattawade. The proposed boundary variation in this section seems to be generally well-judged, 	<p>considered to be at the lower end of the transition in natural beauty which occurs towards the head of the estuary. This is as a result of the adjacent development, the presence of a range of incongruous features nearby (including the railway viaduct itself which is not an attractive feature), the narrowing of the waterway and the increasingly restricted views of the wider estuary towards its head due to the high peninsula of reclaimed land to the north.</p> <p>In light of the evidence supplied by LDA the area was re-visited again. The further site visit confirmed the findings of the analysis of the informal consultation and which resulted in its exclusion. Within the area of estuary the objectors wish to have included, the curve in the waterway towards the north-west and the high Cattawade works peninsula increasingly cut off views of the full extent of the wider estuary, towards the railway viaduct. In addition, the urban influence of parts of the settlement of Manningtree, (including both the adjacent industrial areas and the extensive and visible modern housing rising up the framing valley slopes above the head of the estuary) affects the natural beauty of the area proposed for inclusion, to the extent that it is not considered to meet the outstanding natural beauty criterion.</p> <p>The anticipated effects of the railway depot were considered after the informal consultation, however at that time it was not possible to assess the full degree of likely impact, so this was not a determining factor in the decision to exclude this land. The conclusion that the area was at the lower end of the transition in natural beauty did not rely on a potential further incongruous impact on this area; it was already considered to be at the lower end of the transition in landscape and scenic quality owing to the existing factors outlined above. The LDA Report did not provide any evidence which challenges the assessment of the natural beauty of this area, but concentrated on the type of boundary feature chosen.</p> <p>The issue of how best to cross the estuary in light of the above findings was again re-considered in light of a) the LDA report suggestion that the proposed boundary follows a line which ‘is not physically defined’, b) their suggestion that their proposal to use the railway viaduct provided “an easily distinguishable permanent physical feature” and c) the suggestion from another respondent that the boundary appeared “arbitrary”. LDA commented that the fact that railway viaducts are not considered to be ground features “is an unexpected conclusion in respect of a low-lying, easily distinguished linear structure”. Natural England relies on advice and good practice in boundary making from Ordnance Survey. Their boundary making Guidance states</p>

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	<p>specifically, in respect of the exclusion of the land to either side of the river Stour, and the areas west of the railway viaduct which includes power lines, A137 and sluice. However, the proposed western boundary of the AONB at this point follows a line across the river which is not physically defined, for reasons set out at page 7 of the 'Boundary Considerations' document. The comment in the boundary justification that "railway viaducts are not considered to be ground features" is noted, but this seems an unexpected conclusion in respect of a low-lying, easily distinguished linear structure. A further aspect of the justification seems to derive from the transitional nature of this area and anticipated effects that might arise from the rail depot, however other nearby areas which have been included within the proposed AONB boundary variation that are closer to, and likely to be more affected, by that proposal. In line with the approach taken to the boundary definition along other sections, where transitional areas are included up to a physical boundary, an easily distinguishable permanent physical boundary could be formed by following the Special Protection Area, Ramsar and Site of Special Scientific Interest boundary along the river edge on both the north and south sides, and following the eastern side of the railway viaduct, as shown on Figures 5 and 6.</p> <p>BHLF-TK46-6M92-Q: The Dedham Vale AONB and Stour Valley Partnership: To welcome the proposals to extend the current boundary of the AONB... It notes that "the Suffolk Coast & Heaths AONB Partnership has suggested that Natural England look at new evidence procured by the AONB team identifying additional areas that meet AONB criteria. It considers that Natural England should consider adding these additional areas into any order created to revise the Suffolk Coast & Heaths AONB Boundary." (Analyst note The additional area proposed by the Dedham Vale AONB at the Head of the Estuary is the same as that proposed by the SC&H AONB Partnership and detailed in the Suffolk Coast & Heaths AONB Partnership response above and not repeated here in order to minimise repetition).</p> <p>BHLF-TK46-6MMX-H: The Suffolk Preservation Society (SPS).....Our comments to the consultation are limited to the extensions which impact on the landscape of Suffolk and therefore we will not comment on the proposed extension to the south of the Stour estuary in Essex. Overall SPS welcomes the proposed extension of the AONB designated area which will extend the degree of protection afforded to scenic landscapes of the county and offers an opportunity to conserve and enhance the additional areas.</p> <p>Stour Valley Extension - boundary across Stour Estuary between Manningtree and Cattawade: The west boundary across the estuary appears arbitrarily drawn at the point the estuary narrows. The railway line across the estuary, while necessarily elevated above the ground to a degree, is relatively low lying and easily read in context with the estuary landscape and would create a more easily</p>	<p>that "in no case should roads etc carried on viaducts or running in tunnels be used for boundaries". OS do not 'mere' (fix) boundaries to features such as pylons and viaducts which are not ground features, as they do not relate to a fixed point on the ground. Even if this were not the case, Natural England considers that the area proposed for inclusion east of the viaduct is too transitional to warrant inclusion in an Area of Outstanding Natural Beauty; the viaduct does not provide a suitable boundary feature which would enable the exclusion of this lower quality area.</p> <p>The existing proposed boundary is consistent with the OS Guidance and also the approach taken in other AONBs where a qualifying estuary exhibits a transition in quality towards the head of the estuary proper and where no suitable clearer hard features are present which would exclude lower quality areas. The straight line chosen crosses the narrowest point in the estuary between the tip of the peninsula on the north side of the estuary; and on the south side, a clear, sharp change in direction in the sea wall, immediately adjacent to the area where the extent of the wider estuary becomes fully apparent and an apparently more naturalistic shoreline begins (the Town Beach). This approach is consistent with other estuaries where the same situation applies, including the AONB boundary at the head of the estuary of the River Orwell, though in that case a much large area of rural land adjacent to the settlement was excluded.</p> <p>BHLF-TK46-6MMX-H: The Suffolk Preservation Society commented that if the boundary was drawn to the railway boundary, the whole shoreline of the Cattawade peninsula, south of the railway line, would then lie adjacent to the AONB, benefitting its future management as a wildlife area. For the reasons given above the area is not considered to sufficiently meet the natural beauty criterion. The exclusion of this small area should not prevent its future management for wildlife, particularly in light of the many overlapping layers of biodiversity designations which cover the area. Natural beauty assessment considers the current condition of the landscape and the improvements which may occur on the peninsula lack certainty within a reasonable timescale.</p> <p>Natural England considers that no change to the boundary should be proposed in relation to these submissions.</p>

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	<p>recognised limit to the designated area. Moreover if the boundary was drawn at this point, the whole shoreline of the Cattawade peninsula, south of the railway line, would then lie adjacent to the AONB benefitting its future management as a wildlife area. The peninsula will be increasingly important in views of the AONB as it will continue to be improved in the future as part of the redevelopment of the Brantham site.</p> <p>BHLF-TK46-6MMW-G: Whilst accepting that redevelopment of the dismantled chemical works in Brantham is essential, I think some protection of the river, its banks and marshland is very important to protect the natural beauty over the length of the Stour. ... Hence (and maybe at a future date). I should like to remove the gap between the Suffolk Coasts and Heaths AONB and Dedham Vale AONB even if just between the north and south river bank.</p> <p>ANON-TK46-6M54-N: I have walked both sides of the Stour from Shotley and Harwich to Dedham, including the small area near the White Bridge on the A137. Many white egrets appear regularly near the White Bridge and it makes no sense not to include both banks of the river all the way up to Dedham... The area around the White Bridge needs to be included to provide continuity of the ANOB all the way from Felixstowe and Harwich up to Dedham. Most local residents feel that the Dedham Felixstowe Harwich triangle is a single distinctive area which has an integrated character. The whole triangle is already a holiday destination for any ramblers and birders. It would be a serious marketing mistake to designate them separately.</p> <p>ANON-TK46-6MDZ-A: It would be more manageable if the Dedham Vale AONB joined the Stour Valley extension, thus creating a more efficient and less fragmented management unit.</p> <p>ANON-TK46-6MM4-D: it should about the Dedham Vale boundary</p> <p>ANON-TK46-6MMH-1: In particular, I strongly support recommendation #3 for the 'Stour Estuary between Manningtree and Cattawade'. The AONB Partnership's proposed extension northwestwards takes in the almost all of the upper estuary and includes the narrow islands of saltmarsh known as Hogmarsh. This a significant high tide roost for migrant waders and wildfowl in the autumn and winter months. It is very well known and appreciated locally for the spectacular comings and goings of large flocks that gather and disperse on the incoming and outgoing tides, a spectacle that is easily viewable from the sea wall on the south west side. The AONB partnership recommendation is that their additional extension uses the boundaries of the Stour Ramsar site, Site of Special Scientific Interest and the Stour and Orwell Special Protection Area. However, these designations also include the two estuarine sections between</p>	<p>B) Boundary should adjoin the Dedham Vale AONB boundary at the head of the Estuary BHLF-TK46-6M99-X: Babergh Council, BHLF-TK46-6MMW-G, ANON-TK46-6M54-N, ANON-TK46-6MDZ-A, ANON-TK46-6MM4-D, ANON-TK46-6MMH-1, BHLF-TK46-6MMW-G,</p> <p>One statutory consultee and 6 other respondents suggested including all of the head of the estuary from the existing proposed boundary across the estuary as far as the Dedham Vale AONB boundary. In light of these suggestions this whole area was re-evaluated. The reasons for excluding the area between the existing boundary and the railway viaduct are given in Sub-section A, above.</p> <p>The area from the railway viaduct to the existing Dedham Vale AONB boundary along the A137, was evaluated as part of the original technical assessment work, (included within Evaluation Area S2) and re-evaluated after the informal consultation, when proposals for its inclusion were also made. The original evaluation concluded this area did not have sufficient natural beauty.</p> <p>The area was re-visited again in light of the further proposals for its inclusion. The area includes several small, marshy, coastal meadows and a section of the estuary all with natural heritage value. It also contains the attractive 18th Century Cattawade Bridge. The area benefits from attractive views west towards the valley slopes within the Dedham Vale AONB and also (looking beneath the railway viaduct) of the estuary towards Manningtree and Mistley. Landscape and scenic quality are however significantly affected by the cumulative effects of a range of incongruous features all concentrated within this small area. These include the large concrete flood management gates adjacent to the busy A137 road, the tall gantries of the mainline railway, several high voltage power cables crossing the meadows in very close proximity and the heavily engineered sea walls. Re-evaluation of this area reached the same conclusions as the original technical assessment for the same reasons. The area is not considered to meet the natural beauty criterion.</p> <p>ANON-TK46-6MMH-1: suggested that the boundary could follow the boundary of the biodiversity designations on the estuary, ie the boundary of the Ramsar, Site of Special Scientific Interest and Special Protection Area. Consideration was given to the use of these designations as boundary features during the original evaluation and also whether the inclusion of the head of the estuary area could be warranted as a feature of interest on the edge of the proposed extension. However, as stated above, the area under consideration was not considered to meet the natural beauty criterion and as this area does not lie in a tract that meets the statutory criterion, use of the SSSI boundary in this area would not be in accordance with the Guidance.</p>

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	<p>the railway viaduct and the A137. These are the southern and northern upper arms of the estuary, running up respectively to White Bridge sluice and Cattawade sluice. If the Ramsar, SSSI and SPA boundaries are to be used, then logically they should encompass these areas as well. I would also submit that there is a strong case for including the area of grazing marsh between these two arms. This has experienced tidal breaches to its sea walls over the past year or so and is now also regularly flooded on the high tides, forming a natural extension to the estuarine habitat. In time this will likely revert naturally back saltmarsh, similar to that which existed before the area was walled. Another benefit of taking the boundary right up to the two sluices and the road embankment that links them would be that the Suffolk Coast and Heaths AONB would then be contiguous at this point with the Dedham Vale AONB to the west. As the two AONBs are under joint management, it makes sense to have this point of contact between their boundaries. This is not least because the SPA boundary extends to the west of White Bridge up to the head of the tidal reach, just south of Flatford and fully within Dedham Vale AONB. I will attempt to send a sketch map of my additional proposed boundary extension to the email address supplied.</p> <p>BHLF-TK46-6MMW-G: I support the proposed boundary, (possibly as an interim measure) but feel compromises have been made at Cattawade and would have liked the boundary to follow the banks of the creeks (Cattawade & Middlebridge) as far as Cattawade & the White Bridge to link up with the Dedham Vale AONB.</p> <p>Remove land at the Head of the Estuary BHLF-TK46-6MMK-4: Stour Sailing Club wishes to comment on the proposed Boundary Extension to the South of the Existing AONB - Section One (on Map 4): from existing AONB boundary at Cattawade Foreshore to the Walls Road. We note the exclusion of the head of the estuary from the draft boundary and that the draft boundary is proposed as a straight line between the tip of the peninsula and the right angled corner of the sea wall on the south shore. The rationale given is that the line excludes the majority of the engineered shore line around the head of the estuary, excludes the lower quality area of the estuary and is between two clearly identifiable features on the ground. The documents acknowledge that that no administrative boundaries were utilised for the boundary in this stretch. We understand the rationale to have identifiable landscape markers for the boundaries of AONB, however whilst this proposed boundary makes sense as a line drawn on a map it makes less sense in the local context. The proposed boundary may be geographically the 'tip' of the peninsular, however when seen from the Essex shoreline, the landscape features to the left (a disused Quay for the former Xylonite works at Brantham) and to the right (where the visible shoreline turns back to the North) are more prominent. {Response includes photo}: Photograph taken from the proposed</p>	<p>Natural England considers that the existing proposed boundary at the head of the estuary is suitable and appropriate in the circumstances and no change to the boundary is proposed in relation to these submissions.</p> <p>Deletion C) Boundary should exclude Town Beach and Stour Sailing Club 'hards' BHLF-TK46-6MMK-4: Stour Sailing Club. The Sailing Club propose two alternative boundaries they consider equally valid, first the inclusion of the whole of the Head of the Estuary and second, a line to the point where the Sailing Club's East Compound and Quay makes a right-angled turn towards the last stretch of sea wall, removing a small segment of estuary from the existing proposed extension. Natural England's response to their first suggestion is given above.</p> <p>In relation to the second proposed boundary amendment, the Club suggests that the short section of engineered coastline which has been included within the current proposed boundary has more in common with the area of the head of the estuary which has been excluded from the proposed boundary and bears little resemblance to the historic natural shoreline in this area. Natural England recognises that a small section of engineered sea wall and reclaimed land has been included within the proposed boundary, when most of it was excluded. It is acknowledged that within the area which has been included, the sea wall does have some localised impact on the immediately adjacent area, however this is considered to be outweighed by the fact that the current proposed boundary lies at the point where the full impact of the views of the wider estuary are felt and an apparently naturalistic shoreline begins. Eastwards from this point, landscape and scenic quality are higher and rapidly increase. It is recognised that the 'Town Beach' is artificial, but this stretch of sand does have a more natural appearance than the section of fully engineered shoreline to its immediate west. It also has a positive impact on the landscape and scenic quality of this area which ameliorates the impact of the section of adjacent sea wall. The sandy beach merges imperceptibly with the natural foreshore, which then continues along the Walls section of shoreline.</p> <p>It is suggested by the Sailing Club that the second proposed boundary crossing the estuary alongside The Walls would align closely with the Parish boundary between Manningtree and Mistley and that this would thus be a suitable administrative feature. The Guidance states that where local government boundaries follow a suitable line, it may be administratively convenient to adopt them, but that in the majority of cases they will be unsuitable. The Mistley Parish boundary does not in fact cross the full width of the estuary, only going as far as 'Normans Reach', the channel in the centre of the estuary, before running parallel with this channel. Natural England considers</p>

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	<p>easterly boundary on the South Side (the edge of the Quay where the Sea Wall makes a right angled corner – showing the current proposed Northerly Boundary Point (A). On the Essex side the shoreline along this stretch of Manningtree from the Westerly point of the proposed boundary East to the Parish Boundary with Mistley is heavily engineered with two layers of concrete sea defence walls and two sea defence gates. The proposed boundary includes the area of the Town ‘Beach’ which although a well utilised local asset is wholly artificial, and two concrete ‘Hards’ which are used for boat launching. The proposed boundary also skirts the two Boat Compounds and Quays owned and used by the Sailing Club which are at street (rather than foreshore) level. The landscape at this point now bears little relationship to the historic landscape which featured a shallow gradient from Quay Street to the estuary and an area of semi-industrial activity from the boundary with Mistley West to the Historic Town Dock (filled in during the 1960’s and now forming part of Jewson’s Yard). The small section of the Manningtree shoreline which is included in the proposed AONB extension appears to have more in common with the remainder of the Manningtree/Lawford shoreline and the head of the estuary which are explicitly excluded from the proposed extension. (Response includes photo): Quay Street and the foreshore 1950’s (Response includes photo): Quay Street prior to clearance and building of the first sea defences. (Response includes photo): The ‘Manningtree’ section of the proposed AONB extension – photograph taken from the proposed easterly boundary (the edge of the Quay where the Sea Wall makes a right angled corner. On balance Stour Sailing Club considers that there are equally valid alternatives to the proposed variation of the boundary as a straight line across the Estuary from TM107322 to TM 107319. Option One would be to include the head of the estuary within the boundary of the extended AONB, recognising that short ‘Manningtree’ section which is currently included has much in common with the remainder of the Manningtree and Lawford shoreline to the head of the estuary. Option Two would be to draw the proposed boundary of the AONB extension to a new point on the South Shore at the point at which the Sailing Club’s East Compound makes right-angled turn towards the last stretch of concrete sea wall. (a clearly identified feature). This boundary would also closely align with the Parish Boundary between Manningtree and Mistley (a suitable administrative feature) and the starting point of the Mistley section of the shoreline known as The Walls. {Response includes Map}: Map showing existing proposed boundary and our alternative proposal (option Two) In the map above the maroon line is the boundary proposed in the consultation. The black arrowed line is our alternative proposal taking the same starting point at the tip of the peninsular (sic) on the North side (TM107322) then taking a straight line across the estuary to a new point on the South Shore at the point at which the Sailing Club’s East Compound and Quay makes right-angled turn towards the last stretch of concrete sea wall.</p>	<p>that for the landscape and scenic quality reasons outlined above, the line of the Parish boundary is not a suitable boundary in this case.</p> <p>It is also suggested that the current proposed boundary splits the area of interest used by the Stour Sailing Club. The boundary setting considerations in Guidance also make clear that interests in land such as ownership are not in themselves a reason for including or excluding land from a designation.</p> <p>Natural England does not consider this alternative boundary to be a more robust or suitable boundary than the line chosen. No change to the boundary is proposed in relation to this submission.</p> <p><u>Conclusion</u></p> <p>Natural England has considered the range of different options suggested for including differing areas of additional or less land at the head of the estuary. It remains of the view that the existing proposed boundary around the head of the estuary is suitable and appropriate in the circumstances. It includes the higher quality areas of the estuary and excludes land at the lower end of the transition in natural beauty in this area. No change to the boundary is proposed in relation to these submissions.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
<p>Inclusion/exclusion of land between Manningtree and Mistley including at Mistley Place Park / Mistley Hall</p>	<p><u>Proposed Boundary Amendments</u></p> <p>Include additional areas BHLF-TK46-6MMP-9: Essex County Council strongly supports Natural England's (NE) proposal to extend the boundaries of the SCH AONB in the areas outlined in the consultation.</p> <ul style="list-style-type: none"> • ECC feels that there are additional areas, for which there is new evidence showing them to be worthy of inclusion, that should also be considered by Natural England in the Draft Designation Order when submitted to the Minister. • ECC fully supports the inclusion of additional areas into Essex as a result of this boundary variation project / consultation, and furthermore considers that the name of the AONB should be amended to reflect this in the Draft Designation Order when submitted to the Minister. <p>The inclusion of new areas which have been identified as being of AONB quality, into the SCH AONB are welcomed as they will bring new opportunities for conserving and enhancing the natural beauty of landscapes in Essex (as well as Suffolk). There is also the potential for there to be related economic and employment benefits within the extended areas.</p> <p>Essex County Council is aware of and has supported the decision taken by the AONB Partnership to commission its own consultants to review the consultation material to guide not only the Partnership but also the component partners in their own responses.</p> <p>ECC has reflected on the report produced by, and the verbal communications held with, the appointed consultants and other partners, and believes that the additional work undertaken to be robust and this work therefore forms the basis of the ECC response.</p> <p>ECC has taken the decision to fully support the additional areas proposed for inclusion which are outlined fully in the response of the Suffolk Coast and Heaths AONB partnership response ...</p> <p>ECC also supports the inclusion of additional areas highlighted in the last paragraph of the Manningtree and Mistley section of the SCH AONB response (shown here on p 10), in accordance with comments made by Tendring District Council in their response (see Appendix 3). It is requested that Natural England gives further consideration to the inclusion of these additional areas in the Draft Designation Order when submitted to the Minister...</p> <p>Manningtree and Mistley (text not repeated here; see SC&H AONB Partnership response below for detail of evidence supplied.)</p> <p>BHLF-TK46-6M9K-G: Tendring District Council:</p> <p>1. Purpose of the Report To analyse the information contained in the assessment document produced by Natural England relating to landscape and natural beauty qualities of the estuary and land on the southern shore of the Stour Estuary.</p>	<p><u>Commentary</u></p> <p>16 respondents suggested that Natural England should include more land between Manningtree and Mistley. Many of these respondents provided evidence in support of their proposals. A range of suggested boundary lines were submitted; the majority requesting the inclusion of an area of former parkland between the two settlements, though others proposed differing additional areas of the two neighbouring settlements. The exact areas proposed for inclusion differed and some organisations supported more than one alternative suggestion. A similar range of suggestions to include more land in this area was received during the informal consultation, including from statutory consultees and their inclusion was re-considered at that time. The evidence supplied by these respondents is considered further below. The additions have been divided into the following main themes:</p> <p>A) Include land proposed in SC&H AONB Partnership response B) Include land in SC&H AONB Partnership response and additional areas of the Manningtree and Mistley Conservation Area C) Include parts or all of the settlements of Manningtree and Mistley D) Designate Mistley Place Park</p> <p>A) Include land proposed in SC&H AONB Partnership response BHLF-TK46-6MMP-9: Essex County Council, BHLF-TK46-6M9K-G: Tendring District Council, BHLF-TK46-6M9D-9: Suffolk Coast & Heaths AONB Partnership, BHLF-TK46-6M92-Q: The Dedham Vale AONB and Stour Valley Partnership, ANON-TK46-6MM4-D.</p> <p>The SC&H AONB Partnership proposed the addition of land south of the railway which Natural England identified as meeting the criterion of natural beauty (and included within the Candidate Area), as well as an area north of the railway, (including Mistley Place Park and the areas of recreation fields) which was assessed by Natural England as not meeting the statutory criterion of outstanding natural beauty. This suggestion was supported by both AONB Partnerships, two of the statutory consultees and another respondent.</p> <p>Natural England welcomes the fact that the Report by LDA Design submitted by these organisations as evidence in support of this proposed addition, broadly agrees with Natural England's findings that there are areas south of the railway line in this area which meet the criterion for designation and areas to the north of the railway which do not.</p> <p>It is acknowledged that as stated in the LDA report, the area contains a tributary valley running into the estuary with remnant parkland character and in places retains a strong visual connection with the estuary. It is also acknowledged that the area contains many historic features. Much of the justification in the SC&H AONB response</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>To review the judgements made in relation to the quality and extent of land contained in the proposed extension of the Area of Outstanding Natural Beauty (AONB) and to set out an alternative boundary that is broadly supported by the evidence contained in the report.</p> <p>2. SCOPE OF REPORT</p> <p>This report relates mainly to Evaluation Area S4 – Head of the Estuary to Mistley with reference to a small area in Wrabness in Evaluation Area 5 – Central Estuary and Southern Slopes. It sets out the reasons and justification for including additional land within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Extension. It relates primarily to the land to the south of the estuary including Mistley Place Park and as far as to the boundary provided by the Clacton Road.</p> <p>In terms of the area to the south of Mistley Place Park the content of this document is addition to, and in support of, the views set out in the representation made by the AONB Manager submitted on behalf of the AONB Partnership. Duplication of comments, observations and assessment views has been avoided where possible and this should not be construed as being unsupportive of the contents of that submission.</p> <p>3. MANNINGTREE AND MISTLEY</p> <p>Landscape and Scenic Quality.</p> <p>It is accepted that; on balance and for the reasons set out in the report the settlements of Mistley and Manningtree should not be included in the proposed extension to the AONB.</p> <p>Land between estuary and railway line.</p> <p>In relation to Mistley Place Park the report recognises that ‘much of the area retains a pleasant parkland character’. It is this Council’s view the proposed boundary extension has been draw (sic) too tightly to the estuary because too much weight has been given to the temporary and ephemeral visual clutter on the land, such as fences and field shelters, rather than the intrinsic and underlying natural beauty of the landscape. Insufficient consideration has been given to the importance of the appearance of the land when viewed from the northern shore of the Stour and from other viewpoints on the southern shore of the Stour such as when looking westwards from the sea wall close to the railway bridges at the western extremity of the Evaluation Area. This area makes a significant positive contribution to the character of the landscape in this area and its omission from the extended AONB could compromise the integrity of this part of the extended AONB’ (sic) Mistley Place Park, land within the curtilage of the adjacent unoccupied residential property and the public open space further to the west form an integral part of the local landscape and has an intrinsic natural beauty that reflects human influence. This accords strongly with the description of landscape contained in The European Landscape Convention (ELC): ‘that landscape is an area, as perceived by people, whose character is the result of the action and interaction of natural and human factors’.</p>	<p>and others contains information about these historic features both past and present, its listed buildings and archaeological record as well as its past association with the Rigbys, a once prominent local family.</p> <p>Natural England considered the current contribution of these and other features in this area to natural beauty in its original technical assessment and this was taken into account in reaching a conclusion on which area met the criterion and which did not. In addition to the condition of the historic features, the assessment also took into account issues such as the fragmentation of the landscape, the permanent severance by road and rail infrastructure, the modern suburban nature of the roads and other developments in the area, as well as the municipal quality of the recreation areas on perceptions of natural beauty. The parts of this area which were considered sufficiently outstanding to qualify for designation were included in the Candidate Area. The detailed rationale for this can be found in the technical assessment of natural beauty and is not repeated here. There is no new evidence in the LDA report which alters our assessment of which parts of this area meet the natural beauty criterion and which do not.</p> <p>The Partnership suggests that in relation to the area which does not meet the criterion at Mistley Place Park, Natural England has relied too much on current condition which might improve if it were designated. The Guidance, as informed by previous public inquiries in relation to designated landscapes sets out that the use of the present tense in the wording of the legislation means that the assessment of natural beauty can only take into account the current condition of the area at the time of the natural beauty assessment. It cannot take account of either opportunities to enhance its natural beauty or potential future threats against it, unless there are definite plans being delivered to restore the area within a reasonable timescale. It is for this reason that the assessment relies on current condition in the assessment. Although there has been a Management Plan in place for the Conservation Area since 2010, there is little evidence on the ground that it is being delivered in a way that would raise the level of natural beauty of the area. Natural England remains of the view that the qualifying areas with sufficient natural beauty were included within the Candidate Area (including the area south of the railway).</p> <p>The fact that an area meets the criterion for designation does not however mean that its designation automatically follows. The wording in the legislation requires that designation must be considered to be desirable for the purpose of conserving and enhancing its natural beauty.</p> <p>The Partnership suggests that Natural England should apply a ‘mind-set’ that the areas south of the railway should be included. During the technical assessments, detailed consideration was given to whether it was desirable to apply the concept of ‘wash-over’ to include the area of land which was not considered to meet the natural</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>Land between the railway line and Green Lane. The description of the playing field in New Road – The Welcome Home Playing Field states that the area ‘retains a predominately open and leafy character’. The exclusion of this area because of its management and human influence fails to adequately recognise the visual qualities of the space and does not reflect the recognition of the impact of human intervention as set out in the NERC Act. Land between the railway and Green Lane ‘retains a strongly pastoral character’ with ‘filtered views towards the northern upper valley slopes’ the report also states that ‘views to industrial quayside buildings and the church tower contribute to a sense of place and landscape quality’. The land forms an integral part of the local landscape and is strongly associated with the estuary. The report appears to suggest that the erection of small scale field boundaries and the existence of stag headed Oaks are negative influences on the natural beauty of the area. This is not believed to be the case because of the temporary nature of fencing and the fact that dieback in the crowns of mature and over-mature Oaks is an inherent part of the life cycle of the Oak tree.</p> <p>Land south of Green Lane to the Clacton Road The land south of Green Lane to the Clacton Road is described broadly in terms of land to the east of Dairy House and land to the west of Dairy House. The land to the east ‘retains a strong parkland character’ and from within the body of land the experience of the visitor is one of tranquillity and natural beauty. The quality of the landscape compares favourably with other designated land within the Suffolk Coast and Heaths AONB and from experience within other AONB’s elsewhere in the country. School Wood on the eastern boundary is a strong boundary feature that is a natural buffer between the countryside and adjacent developed land. The land to the west is accurately described as being ‘in transition to the plateau landscape’ however small tributaries of the Stour create interest and from many points along the Clacton Road there are clear views over the undulating land towards the estuary. In terms of a practical boundary for a landscape scale designation the Clacton Road would be appropriate, visible and permanent landscape feature. Again, the suggestion that agricultural activities such as ploughing and the fact that some Oaks are ‘Stag – Headed’ detracts from the quality of the landscape do not appear to be justified.</p> <p>Furze Wood is a prime example of Natural Beauty. The ancient Oak pollards reflect the historic use of the land and the secondary growth comprising primarily Oak with some Pine plantation and invasive Sycamore show natural regeneration and human intervention at work. The open grassland is one step away from heathland which reflects the underlying soil type and geology. The appearance, qualities and use of the woods, closely associated with tributaries to the Stour and consequently the Stour itself provide a magical environment and experience that reflects the true quality of the landscape.</p> <p>Relative Wildness and Tranquillity The key issue in the assessment of wildness and tranquillity is the full and proper</p>	<p>beauty criterion, in order to include the land to the south which was considered to meet the criterion for designation.</p> <p>AONBs are national designations formally assessed as being the country’s most important areas of outstanding natural beauty. It is thus only in exceptional circumstances that areas assessed as not qualifying are considered for inclusion. This consideration was detailed in section 6.1.3 of the Desirability Assessment. It concluded that the area of qualifying land south of the railway was not of a sufficient size, nor satisfactorily located to justify designation or the application of wash-over to the non-qualifying areas to the north and could be sufficiently well managed for its interest features through the existing management mechanisms, particularly its Conservation Area status. No detailed evidence was supplied by the Partnership in relation to this assessment of desirability to challenge this conclusion. Natural England remains of the view that the consideration of desirability was robust and its conclusions remain sound.</p> <p>In relation to the proposed revised boundary, Natural England agrees that the proposed boundary would allow the qualifying areas to be included and exclude the less intact land around the current Mistley Hall. It also largely follows potentially suitable features, though it does include an area of the historic core of the settlement of Mistley containing a significant number of listed buildings. The inclusion of the built up area would split the settlement and would thus not be in line with the boundary setting considerations. In light of the decision in relation to the desirability of the designation of this area, a suitable boundary around this area is not however required. Natural England considers that the current proposed boundary, excluding the lower quality areas which do not meet the natural beauty criterion and avoiding the splitting of the settlement, remains appropriate in this area.</p> <p>No change to the boundary is proposed in relation to these submissions.</p> <p>B) Include land in SC&H AONB response and additional areas of the Manningtree and Mistley Conservation Area BHLF-TK46-6M9K-G: Tendring District Council, BHLF-TK46-6MMP-9: Essex County Council, ANON-TK46-6MBM-U: BHLF-TK46-6MM8-H, ANON-TK46-6MK6-D, ANON-TK46-6MMDM-W Several respondents including one statutory respondent propose including more of the area covered by the Manningtree and Mistley Conservation Area within the proposed extension. Tendring propose the inclusion of the area outlined above in the SC&H AONB LDA Report plus additional land further to the south west of Dairy House and around Mistley Hall, as far as the Clacton Road. Essex County Council stated that they also support the inclusion of this area despite the fact that this area was specifically excluded from the proposed boundary suggested by LDA design which formed the basis of their evidence. They did not supply any new evidence as to why</p>

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	<p>consideration of the word 'relative'. The dictionary definition of relative says: - having meaning or significance only in relation to something else; not absolute. In this respect it is important to consider the proximity of adjacent settlements and the relative wildness and tranquillity of the area in terms of the perception of users of the area. It is not reasonable to compare relative wildness and tranquillity of this area with that experienced elsewhere in the country – such as the north Norfolk Coast – where there is a higher ambient level of wildness and tranquillity. Relatively speaking many areas within the proposed extension provide 'relative wildness and tranquillity'. The user's experience of these factors may be for fairly short periods of time when people use The Walls, The Animal Sanctuary, The Welcome Home Playing Fields or the network of Public Rights of Way further to the south for limited amounts of time, such as during lunch breaks, to connect and re-connect with the environment.</p> <p>Natural and Cultural Heritage Insufficient consideration and weight has been given to the natural and cultural influences on the landscape during the time of the Rigbys. Much of the land shown on the attached map formed part of the estate associated with the Old Mistley Hall and originally named The Home Park. Many of the original landscape features remain visible as reminders of the history of the Rigby's influence such as: Beech Plantation, Alder Car Plantation, The Round Clump and of course, part of Mistley Hall itself.</p> <p>Evaluation On balance it is considered that insufficient weight has been given to the beauty of the local landform and underlying natural beauty of the landscape, that the justification for the exclusion of areas land has been based on the existence of insignificant and temporary clutter and that issues relating to human influence have been considered negatively rather than accepting the reality and positive aspects of effects that people have had on the landscape in this part of Essex. The opportunity to recognise and protect one of the most valuable landscapes in Essex should not be 'sold short' by too strict an adherence to technical guidance and greater weight should be given to the intrinsic beauty of the area and to the user's experience of such a beautiful estuarine landscape. It is considered that the land, identified on the attached plan has a deep seated natural beauty and is fundamentally associated with the river by way of the tributaries feeding into the Stour. The topography of the land and the features contained thereon contributes to the integrity and overall quality of the Stour estuary.</p> <p>Conclusion. It is accepted that the beauty of virtually all our cherished landscapes is in part due to human influence such as agriculture and forestry. As such; farmland, woods and parkland should be assessed in their own right and not considered less significant or less important than more traditional 'Constablesque' landscapes. This is particularly relevant in relatively densely populated parts of Essex where the urban and suburban elements of the landscape abut and</p>	<p>this additional area might meet the natural beauty criterion. In light of the detailed submission by Tendring and others, their evidence has been considered below.</p> <p>Natural England welcomes the fact that on balance, Tendring agrees with the reasons given for the exclusion of the settlements of Manningtree and Mistley. Natural England also agrees with Tendring that the areas south of the railway to Green Lane, south of Green Lane but east of Dairy House and Furze Wood have sufficient natural beauty to warrant designation and these were included within Natural England's Candidate Area accordingly.</p> <p>In relation to the land between the estuary and railway line, Tendring suggests that Mistley Place Park was excluded on the basis of 'temporary and ephemeral clutter'. The reasons for the conclusion that Mistley Place Park and other areas north of the railway line did not meet the natural beauty criterion took into account a wide range of issues affecting this area; and did not rely solely on the 'temporary clutter' of incongruous features present in this area. Other issues included the fragmentation of parts of this landscape, the permanent severance by road and rail infrastructure, the modern suburban nature of the roads and other developments in the area, the poor condition of the remaining historic and parkland features such as the Hopping bridge and the landscaped pool as well as the effect of the municipal quality of the recreation areas on perceptions of natural beauty in this area. The full reasoning is contained in the Assessment of Natural Beauty and a summary is included in the section above and not repeated here.</p> <p>In relation to comments made about the recreation areas and the area adjacent to New Road, these were considered in some detail and whilst the open grassy areas and rows of trees provide a pleasant area of open ground between the two settlements, they were not considered to meet the factors for outstanding natural beauty contained in the Guidance for the reasons given above, particularly in combination with the adjacent area of Mistley Place Park. The area as a whole has been reconsidered and Natural England remains of the view that the area from The Walls road, south to the railway, does not meet the criterion of natural beauty.</p> <p>Natural England agrees that the area of Mistley Place Park and some parts of the higher estuary slopes are visible from some parts of the north side of the estuary and the estuary head and provide an apparently undeveloped pleasant wooded backdrop to this stretch of the estuary. However this was considered to be outweighed by the range of issues affecting the area, as outlined above and did not alter Natural England's overall judgement that this area does not have sufficient natural beauty.</p> <p>In relation to comments made about the area west of Dairy House to the Clacton Road, this area was considered in detail at the time of the original assessment and again after the informal consultation. Whilst it is acknowledged that it contains two</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>overlap the countryside. Taking into account the AONB designation is a 'landscape scale' designation and that a 'field by field' assessment it is not recommended it is considered that a pragmatic and practical view on the position of the boundary should be taken and that the omission of areas for reasons set out in the Natural England report are not appropriate.</p> <p>Recommendation.</p> <p>Land within and to the south of Mistley Place Park as far as the Clacton Road is included in the AONB extension and the boundary is re-positioned as shown on the attached plan (Appendix 1). The plan excludes the settlements of Mistley and Manningtree but includes a meaningful tract of land that is defined by a realistic boundary that is easy to interpret on the ground and is considered to meet the natural beauty and desirability threshold to merit inclusion in the AONB extension.</p> <p>BHLF-TK46-6M9D-9: In summary the Suffolk Coast & Heaths AONB Partnership Response is:</p> <ul style="list-style-type: none"> • To welcome the proposals to extend the current boundary of the AONB • Request that Natural England reviews new evidence for areas that the AONB Partnership consider to be worthy for inclusion in any order to revise the AONB Boundary... <p>The SC&H AONB Partnership consider the boundary review to be a terrific opportunity to conserve and enhance the landscapes of Essex and Suffolk that meet the designation criteria. The Partnership has therefore commissioned its own consultants to review the consultation material to guide the Partnership response. This work has identified some additional areas that it considers worthy of the AONB designation...</p> <p>2. Manningtree and Mistley</p> <p>The lengthy narrative regarding this area in the Natural England documentation reflects the difficulties with identifying a proposed boundary variation here. We broadly agree with the findings which identify that there are areas of land within the Manningtree and Mistley Conservation Area, to the south of the railway line, which merit inclusion within the AONB, and areas to the north which perhaps do not. However, in our opinion, the Natural England justification that areas to the north of the railway line should definitely be excluded relies excessively on current landscape condition – which is something that inclusion within the AONB could improve. With the mind-set that areas to the south of the railway should be included, and areas to the north could be included; a boundary to include part or all of the Conservation Area would be appropriate and in particular those areas with views to, and associations with, the estuary; assemblages of historic buildings and their related parkland; and veteran trees. Our judgement is that the most appropriate boundary would include the more intact and legible areas of historic parkland associated with the former Mistley Old Hall, surviving features of which are designated Grade II (List Entry 1240275/ 1240276). The Old Hall</p>	<p>shallow tributary valleys and from the highest ground provides views towards the upper estuary slopes on the north side of the estuary, the area as a whole no longer displays an intact historic parkland character owing to the ploughing of much of the park grasslands and progressive loss of other parkland features. In addition, the character and quality of this area is clearly in transition to that of typical plateau landscape and tranquillity is affected by the busy Clacton Road and the influence of the adjacent settlement. The remaining parkland trees in this area appear to be in declining condition despite their relatively young age, possibly due to root damage through the evident ploughing in immediate proximity (Natural England agrees that the development of a stag-headed crown is a natural part of oak tree development, but this is normally only seen in ancient veteran oaks, unless the trees have become stressed or the roots damaged). The landscape and scenic qualities of this area will also be further affected by the approved development of part of this area of former parkland for housing.</p> <p>Tendring Council also questions the assessment of relative wildness and tranquillity. It is suggested that it is not reasonable to compare the levels of this factor found in this area against other places with 'a higher ambient level of relative wildness and tranquillity'. As stated in the Guidance and established in past public inquiries, the test for designation as AONB or National Park is against 'wider countryside' and not, as suggested by Tendring, against either other nationally designated areas or the neighbouring settlements, and this was the test applied here. In the area which was considered not to meet the natural beauty criterion, levels of these two factors were not considered to be higher than that found in other undeveloped rural areas in the wider English countryside.</p> <p>In relation to Tendring's comments regarding the weight given to the natural and cultural heritage of the area in the time of the Rigbys, NE guidance makes it clear that it is the current condition of the area at the time of the assessment which is relevant to natural beauty not its condition at a previous period in history. Furthermore, natural and cultural heritage needs to make a contribution to natural beauty and cannot be included in a landscape designation for its own sake. The remaining historic features are interesting and were taken fully into account, but the condition of many of these features was noted to be declining and this affected perceptions of their contribution to natural beauty.</p> <p>Natural England remains of the view that the exclusion of this area as a whole ensures it does not 'compromise the integrity of the extended AONB' and its designation and management as a Conservation Area would protect its character and integrity.</p> <p>In relation to the comments about the European Landscape Convention and human influence, Natural England agrees that the area accords with the ELC description of</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>was built for the Rigby family in the early 18th century and remodelled for Rt.Hon. Richard Rigby (1722-1788) to the design of Robert Adam in circa 1777. This remodelling is contemporary with the Grade I Listed Mistley Towers, also by Adam (List Entry 1240390 and 1261061) which are also designated as a Scheduled Monument (List entry 1002154) and several other buildings and structures visible in the landscape today. It is noted that the church was to "...stand out strikingly central in the view from the Hall to down to the River Stour" indicating the importance of the relationship of the River Stour in views. The gardens were described by Rouchefoucauld in 1784 as the best he had seen in England.</p> <p>The area defined includes:</p> <ul style="list-style-type: none"> • Land that forms a legible topographic valley feature formed by a watercourse that that enters the Stour estuary at the Grade II Hopping Bridge (List Entry 1240389). • Areas with the strongest visual connections to the Stour estuary – both in terms of views towards the estuary and reciprocal views from the water and northern shores. <p>Areas which display a parkland character with established trees and copses. Grade II Church of St Mary and St Michael, parish church of Mistley with Manningtree c.1868-70 (List Entry 1074993).</p> <ul style="list-style-type: none"> • Groupings of late 18th century Listed Buildings/ structures which have associations with the Rigby family and that are contemporary with Mistley Old Hall and Mistley Towers – notably: The collection of predominantly agricultural buildings at Dairy House, comprising the Dairy House, Dairy Cottage and attached stables, (List Entry 1260993); lodge, (List entry 1261079); former cowhouse, (List Entry 1240535); former brewhouse (List Entry 1260955) and former dairy and office (List Entry 1240536). The collection of buildings at Mistley Green comprising Kowloon (List entry 1240342); White Horse House (List Entry 1261080); Post Office (List Entry 1074931); 1-12 The Green (List Entry 1261081); and East Lodge (List entry 1240341). Buildings on the south of the High Street, comprising a shops/dwellings (List Entries 1074929, 1360966, 1074930, 1360967, 1074928, 1360965, 1240280 and 1356640) and terraced dwellings to the north of the High Street (List Entry 1240278 and 1074955). <ul style="list-style-type: none"> o Swan Fountain (List Entry 1074959) and adjacent Fountain House (List Entry 1240279) which is reputed to have been built as a Malting Office or assembly room or hotel for the projected spa for Richard Rigby. Mistley Quay Wall (List Entry 1413747) designed for Richard Rigby in 1777 by the Duke of Bridgewater. • Hopping Bridge (List Entry 1240389), designed by Robert Adam for Richard Rigby. • Features included in the Essex County Council Historic Environment Record (HER)5 related to the early evolution of the settlement and that are associated with the Rigby family, including evidence of: the line of the Roman road from Colchester (SMR Number 3233); the previous main road to Mistley that ran close 	<p>landscape, and also agrees that land is not prevented from having natural beauty if it is partly the result of human intervention (as stated in the Natural Environment and Rural Communities Act 2006). This does not however mean that all landscapes affected by man qualify for inclusion in a national landscape designation. To warrant inclusion, areas have to demonstrate outstanding natural beauty in the terms of the legislation and as set out in the Guidance and clarified during public inquiries and court cases held into past designations. This requires the assessment of natural beauty in relation to the factors contained in the approved Guidance and not against the ELC or the value of the area as a recreation space for local people.</p> <p>In relation to comments about how the area is used for informal recreation by local people, this is not a relevant consideration for national AONB designation in contrast to National Park designation, owing to their different purposes.</p> <p>In conclusion, the characteristics of the area mentioned in Tendring and others' responses were fully taken into account during the assessment of natural beauty and again after the informal consultation and have been commented on accordingly. As stated above re. the SC&H AONB Partnership response, and in the Guidance, an area has to demonstrate sufficient natural beauty in order to warrant inclusion in a national landscape designation. The area was re-visited after the consultation and the original conclusions in the assessment of natural beauty of this whole area were found to be sound.</p> <p>As stated above Natural England agrees with Tendring and others that parts of this area, south of Green Lane and east of Dairy House, do have sufficient natural beauty to warrant designation and these areas were included within the Candidate Area. However they were excluded from the proposed extension when issues of desirability were considered. Natural England did not consider it to be desirable to 'wash over' (ie include) the areas that do not meet the criterion between Mistley Place Park and the railway, in order to include those areas further to the south which do. The reasons for this decision are given in the Assessment of Desirability. No new evidence was supplied which required us to reconsider the issues of desirability set out in the technical assessment. No amendment to the boundary is proposed in this area as a result of these submissions.</p> <p>C) Include parts or all of the settlements of Manningtree and Mistley BHLF-TK46-6MMP-9: Essex County Council, ANON-TK46-6MBM-U, ANON-TK46-6MBC-H, ANON-TK46-6M59-T, ANON-TK46-6M9U-T, ANON-TK46-6MMD-W, ANON-TK46-6MBC-H. Several respondents, including Essex County Council suggested including part or all of the settlements of Manningtree and New Mistley. These two settlements were considered in some detail in the evaluation of natural beauty. The special intact nature of the historic core areas of both settlements was</p>

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	<p>to Mistley Old Hall (SMR Number 7482); the site of a medieval manor, fishponds and deserted village (SMR Number 3206); Mistley Hall (SMR Number 7477) and gardens (SMR Number 74810); The site of the planned industrial (and later spa) settlement of the early to mid 18th century by Richard Rigby (SMR Number 34651).</p> <p>A significant proportion of the area included in the revised AONB boundary, refer to Figure 3 falls within the Manningtree and Mistley Conservation Area. The Conservation Area Review (2006) highlights the important role of the Rigby family in shaping Mistley - both in terms of the hall, park and associated buildings but also commercial and residential properties in the village. The boundary of the additional area of landscape to be included within the AONB follows easily distinguishable permanent physical features. From the B1352 (The Walls) the boundary follows the settlement edge of Manningtree south to the 'The Park' and continues along the tree-lined footpath path from 'The Park' to follow the southern boundary of Dairy Wood. West and south of Dairy Wood the boundary follows field boundaries adjacent to a public footpath to the B1035 Clacton Road (which also defines the southern extent of the Manningtree and Mistley Conservation Area). The boundary returns north at Beech Wood to follow the edges of woodland/field boundaries and footpaths northwards towards the railway line. North of the railway line the boundary extends to join 'The Green'; continues along The Green to High Street, turning briefly eastwards and then north to meet the riverside and then westwards incorporate the Swan Basin and collection of Listed Buildings south of Mistley Towers, refer to Figure 4. An argument could be made to include areas within the Manningtree and Mistley Conservation Area west of Dairy House and around Mistley Hall. However, the tree lined lane which we suggest could form the revised boundary provides a strong separation between the lower-lying areas of more intact parkland and those which are both less intact and are more strongly associated with the plateau to the south. It also excludes the site recently consented for the development of housing north of New Road at the eastern edge of Manningtree (Tendingr application 17\00004\OUT, appeal APP\1560\W\17\3176089).</p> <p>BHLF-TK46-6M92-Q: The Dedham Vale AONB and Stour Valley Partnership: To welcome the proposals to extend the current boundary of the AONB... It notes that "the Suffolk Coast & Heaths AONB Partnership has suggested that Natural England look at new evidence procured by the AONB team identifying additional areas that meet AONB criteria. It considers that Natural England should consider adding these additional areas into any order created to revise the Suffolk Coast & Heaths AONB Boundary." (Analyst note The additional area proposed by the Dedham Vale AONB at Mistley is the same as that proposed by the SC&H AONB Partnership and detailed in the Suffolk Coast & Heaths AONB Partnership response above and not repeated here in order to minimise repetition).</p>	<p>recognised. Nevertheless, both settlements have undergone significant expansion in the 20th Century with more recent development extending on to the adjacent plateau where landscape quality is declining. As a result the settlements were not considered to sit fully within a high quality landscape. Whilst the historic cores remain strong and intact, it is not possible to include only the main historic centres within a Candidate Area as this would ultimately result in the splitting of a settlement during boundary definition which past precedent precludes as per the Guidance. For these reasons the settlements were excluded from the Candidate Area in their entirety. No change to the boundary is proposed in light of these submissions.</p> <p>D) Designate Mistley Place Park ANON-TK46-6M9N-K and others suggest that the area proposed by the SC&H AONB Partnership should be designated to stop its development. The Guidance makes clear that land should not be included merely to seek to protect it from development proposals. Natural England considers that this area does not meet the criterion for designation of natural beauty and that it is not desirable to include it through the use of wash-over. No change to the proposed boundary is suggested in relation to this submission.</p> <p>Conclusion Natural England has considered the range of proposals to both include additional areas around this proposed extension and to remove areas from within it. Natural England considers that an appropriate balance has been struck and that the area included within the proposed Stour Estuary Extension meets the criterion for designation, that it is desirable to do so and that the existing proposed boundary is appropriate and sufficiently robust. No change to the proposed boundary is recommended in this area.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>ANON-TK46-6MBC-H: But you must include Mistley Place Park and Mistley.</p> <p>ANON-TK46-6MM4-D: Mistley Park is a naturally beautiful part of this area.</p> <p>ANON-TK46-6MMD-W: Areas Mistley, Wrabness etc also note Grayson Perry house for Julie project at Wrabness</p> <p>BHLF-TK46-6MMN-7: It is quite obvious that the farming lobby has again triumphed in thwarting attempts to protect our countryside, since the criteria used to establish the AONB on the north side of the Stour are far more expansive than the present ones for the south bank. If the present criteria were now applied to the north bank half of it would disappear. We put forward our proposals and enclose a map, the boundaries of our proposed extension to the recommended boundary can easily be tweaked. Our complaint is that all of the area of “outstanding natural beauty has been missed out. Please now refer to our map. (Analyst note, this refers to Mistley Hall/MPParea see NE 129)</p> <p>Key</p> <ol style="list-style-type: none"> 1. The green shading is by and large the most beautiful part of our village, which merits inclusion in any AONB. This is basically the minimum to be included. 2. The yellow is a possible extension for continuity of your boundary and our proposal. 3. a) Purple near the Smithy is the same logic as for ‘2’. b) Mistley Place Park. We agree that <u>at present</u> this is a mess, but that could easily change. Not all the area is unacceptable. The wood is still intact. I quote p8 of the Consultation Document “Incongruous Development....unless it is of a temporary or transient nature”. This area fits the cultural and historic criteria:- Hopping Bridge, the pond, the wood and the gatehouse. Given the now very restrictive criteria we make the following points which justify including the green shaded area in the extension of the AONB to the south bank of the Stour. 1. It includes the most scenic part of the village. This is not open to question. 2. Basically it has not altered much in 200 years. Reference to old maps will show this. See B Scale Estate Map 1778 (ERO) etc. 3. It encloses only two habitations, Dairy House Farm, and Mistley Old Hall (remains of), both of which are of historical value. 4. It skirts proposed areas of development. 5. It is criss-crossed by several, much used, footpaths. Paths used because of the scenic views afforded by these paths. 6. It encloses ancient woodland. Dairy House Wood, Laundry Wood, Beech Plantation, Game Keepers Wood, Furze Hill, part of School Wood. 7. It encloses some of the oldest oaks in Essex, Nobby on Furze Hill being one of them. 8. It encloses 3 – 4 valleys, as can be seen on the map. 	

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	<p>9. It extends the inclusion of the Essex Way. 10. It will, hopefully, stop the rerouting of ancient footpaths. 11. It contains sites of cultural and historic interest. The Rigby Estate, Mistley Old Hall, Dairy House Farm, a site where a Bronze Age beaker was found, (possibly indicative of a settlement) remains of ha-has, the church and WW2 remains. 12. There is a lot of wildlife in the area. In particular badgers, raptors, wildfowl, attracted by the ponds, including swans and geese which use the area for breeding. Otters have been seen, one was accidently killed along the Walls. Also deer. 13. Google Earth shows clearly that this area is of scenic value. The above fulfill all the criteria on p7. It is not clear from your map if the Walls at Mistley has been included. This is a greensward of common land between Portishead House westwards to the sea wall and the road to the south. This should be included. Ps there is a good argument for including the Mount. We can send more photos to show the area as it is now.</p> <p>ANON-TK46-6MK6-D: I would like to the AONB extended eastwards, so that it runs to the south of Mistley within the line of the Clacton Road, so that it borders the Essex Way until it reaches almost to New Road. The fields between Dairy House Farm and Mistley Heath are very attractive, the area contains a striking small bluebell wood, two ponds, some very old pasture land, and various streams and springs: there is considerable variety within a small area. It provides useful habitat for numerous species of bird, including herons (I saw one there this morning), egrets (ditto), and woodpeckers (both green and lesser spotted), amongst others. There is also at least one badger sett in this area. While it is not visible from the river, it is a logical continuation of the AONB.</p> <p>BHLF-TK46-6MM8-H, EXTENSION TO THE AONB - SUPPORT Our first comment must be that we support whole-heartedly all new and / or extensions to existing conservation areas in the UK to protect our valuable wildlife, beautiful countryside, waterways, coast and landscape. EXTENSION LESS IN AREA THAN EXPECTED - CONCERN However, we do have concerns about the size of the proposed extension (Natural England's (NE)) in this consultation. It is far less, on the South side of The Stour (Mistley) than expected and, proposed by Tendring District Council (TDC) in their draft, still unadopted, Local Plan (LP). TDC's AONB extension (see below map and hyperlink to website) – green broken line includes, at Mistley, Furze Hill, land North of Stour View Close and, East of Stour View Avenue and right up to the North edge of Harwich Road – Mistley. However, the area outlined in this consultation does not.</p>	

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	<p>ANON-TK46-6M9U-T: We believe that the Mistley Towers which are all that remain of the original church of St Mary should be included in the AONB and would like to suggest that the boundary runs along the road beside the Towers. The church was commissioned by Richard Rigby, owner of the Mistley estate, and designed by Robert Adam, the famous architect. We would also like to see the boundary extended to include the older parts of Mistley High Street, including the swan fountain and The Green.</p> <p>ANON-TK46-6M59-T: It should include all of Mistley and incorporate the Essex Way</p> <p>ANON-TK46-6MDM-W: I would have liked to have seen the coastal countryside around Manningtree and Mistley included in the AONB. See Conservation Area studies carried out for previous Local Plans.</p> <p>ANON-TK46-6MBC-H: But you must include Mistley Place Park and Mistley</p> <p>ANON-TK46-6MBM-U: I think the proposed boundary should be extended to take the historic centres of Manningtree and Mistley, to acknowledge the value and number of listed buildings. I also think that the boundary could roughly follow the Manningtree & Mistley Conservation Area which takes in the potentially Roman sited NBNAtlas hotspot, between Lawford and Mistley, currently preserved as a strategic green gap... Also, between Manningtree and Mistley running either side of Green Lane are landscapes that are quintessentially English and remarkably peaceful and seem to be from another time.... would like to send photographs and extended boundary for Stour Estuary Extension (see NE 99 in hard copy file).</p> <p>ANON-TK46-6M9N-K: Given that an external developer is hoping to build on Mistley Place Park it would be good it see it included within the AONB as the housing development would certainly detract from the area, spoiling the view of the northern shore of the estuary and destroying the natural habitats of the area where kingfishers are frequently seen.</p>	
<p>Include/ Remove land between New Mistley and</p>	<p><u>Supporting Proposed boundary</u> ANON-TK46-6M55-P: This would seem to be an appropriate boundary. It is contiguous with the existing AONB which includes only the northern valley sides of the estuary. Together they form a visual landscape unit with a strong estuarine influence. ... This will protect and offer a natural boundary for the rest of the south side of the River Stour, protecting its high quality landscape. To the east, it will protect the important estuaries and ancient woodland up to and beyond</p>	<p><u>Commentary</u> Three respondents have submitted specific comments on the boundary in this area, one in support of the proposed boundary, one requesting the inclusion of additional land and one suggesting the removal of land. These areas have been divided into the following themes. A) Support for proposed boundary B) Include Additional Areas north and east of New Mistley</p>

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Bradfield	<p>Copperas wood. It takes the AONB area in the west up to Mistley and a greenfield site where 300 homes are about to be built. The developer has recently requested that this is increased to 500.</p> <p><u>Proposed Boundary Amendments</u></p> <p>Include additional areas between New Mistley and Bradfield BHLF-TK46-6MM8-H, EXTENSION TO THE AONB - SUPPORT Our first comment must be that we support whole-heartedly all new and / or extensions to existing conservation areas in the UK to protect our valuable wildlife, beautiful countryside, waterways, coast and landscape. EXTENSION LESS IN AREA THAN EXPECTED - CONCERN However, we do have concerns about the size of the proposed extension (Natural England's (NE)) in this consultation. It is far less, on the South side of The Stour (Mistley) than expected and, proposed by Tendring District Council (TDC) in their draft, still unadopted, Local Plan (LP). TDC's AONB extension (see below map and hyperlink to website) – green broken line includes, at Mistley, Furze Hill, land North of Stour View Close and, East of Stour View Avenue and right up to the North edge of Harwich Road – Mistley. However, the area outlined in this consultation does not. Our particular concerns arise around the land (highlighted by the yellow circle on the map) being excluded and how vulnerable this leaves sensitive designated conservation areas that already exist - RAMSAR, SPA, SSSI, existing AONB and the estuary right up to The Haven (Harwich) and the river Orwell. Tendring District Local Plan 2013-33 & Beyond Publication Draft – Policies Map 1 (West Tendring) Shown below. https://www.tendringdc.gov.uk/planning/local-plans-and-policies/view-our-local-plan/localplan-submission-documents</p> <p>We feel strongly that the new extension could and, should, provide the estuary's protected and endangered (some highly – red listed) species more protection by covering a larger area. The difference in area between what TDC proposed as an extension and NE are proposing excludes habitat and wildlife that is not only of local and national importance and significance but, also international. As such, it should be afforded the protection it deserves and warrants for future generations and us. The best form of conservation must be not losing valuable habitat and species in the first place!</p> <p>VALLEY, RILL AND STREAM SUPPLYING THE ESTUARY/AONB - CONCERN The area highlighted, by the yellow circle above, includes a valley that supports numerous wildlife (See Ecological Assessment – Attached below). We have, for many years, reported turtle doves in this area and, provided photos to Operation Turtle Dove. Sadly, for the last 2/3 years, we have not heard or seen the turtle doves – absence coincides with planning applications in the valley area and disturbance – a species that is predicted to be totally absent from the UK in the</p>	<p>C) Remove land between New Mistley and Bradfield</p> <p><u>A) Support for proposed boundary</u> ANON-TK46-6M55-P: Natural England welcomes the comments provided in support of the existing boundary line which are in line with Natural England's assessments.</p> <p><u>B) Include Additional Areas north and east of New Mistley</u> BHLF-TK46-6MM8-H requests the inclusion of an area of land which has been allocated for housing in the local plan and lies within the settlement boundary for Mistley. It is also the subject of an approved development for housing. The respondent comments on the vulnerability of the sensitive designated conservation areas that already exist in the area – RAMSAR, SPA, SSSI, existing AONB and the estuary. This is accepted, however previous precedent reflected in the boundary setting considerations in the approved Guidance has established that land on the margins of an AONB identified in Local Plans or having the benefit of planning permission should be excluded. Land should not be included merely to seek to protect it from specific development proposals.</p> <p>Natural England recognises the validity of the comments made in relation to the character and quality of this area by this respondent, but even though it lies on the visible estuary slopes immediately adjacent to the proposed extension boundary, and contains features of interest such as the tributary valley and interesting wildlife, the area has been excluded in line with the Guidance owing to the pre-existing development permissions.</p> <p>C) Remove land between New Mistley and Bradfield BHLF-TK46-6MM2-B: Armstrong Rigg Planning on behalf of Hopkins Homes: The key points made by the planning consultants employed by Hopkins Homes about the area lying East of New Mistley to Bradfield relate to their view that the area south of the B1352 is a transitional landscape of lesser quality largely due to the large scale, industrialised agricultural fields that characterise the area; and that the boundary is not robust. Their comments in relation to natural beauty divide the area in two and each area is considered separately below, followed by consideration of the comments relating to the robustness of the boundary, under the following headings: Ci) The area between New Mistley and the disused railway line and Cii) The area between the disused railway line and Bradfield. Ciii Robustness of the boundary.</p> <p>Ci) The area between New Mistley and the disused railway line This small area of land comprises the upper estuary slopes adjacent to the settlement of New Mistley and several small, irregular pastures and arable fields to the south, with several areas of broadleaved woodland (particularly alongside the main railway line). It also contains a small wooded tributary valley and associated gentle slopes</p>

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	<p>very near future! This valley also, importantly, contains a rill/natural stream that supplies fresh water to the estuary.</p> <p>VALLEY/LANDSCAPE HIGH POINT (VISIBLE FROM ESTUARY/SUFFOLK AONB)</p> <p>In Essex, the landscape is generally flat so valleys and hills are valuable features from both an appearance aspect and the different habitat they provide. This area of Mistley is one of Essex's highest points but it seems that it has been left out of NE's proposed AONB extension, even though it can be seen from the estuary and the North side of The Stour/Suffolk's AONB. Anything that happens on this side has the potential to affect not only the environment in this and the surrounding area but, from an aesthetic point of view, its appearance could affect negatively on how the AONB looks from other viewpoints.</p> <p>HOUSING DEVELOPMENTS – IMPACT ON THE ESTUARY/SURROUNDING AREA</p> <p>This area is being subjected to an enormous amount of planning applications for housing. Over the last few years, in Lawford, Manningtree, Mistley and Bradfield, permission has been granted to 2000 (approaching) dwellings with no end in sight. Due to TDC still not having an adopted LP in place, this level of development is likely to continue unabated. The latest comments from TDC were that the LP should be adopted within the next 9 months but, based on what residents have been told in the past, who knows when and, if, this will happen and, whilst it remains unadopted, TDC have very little, if any, power to stop developments. Should TDC refuse any major planning application the applicant will appeal via the Inspectorate and have it granted. The scale of housing that we have been subjected to equates to the equivalent of a Garden Village!</p> <p>Alternatively, put another way, a completely new Lawford! This puts enormous pressure on our outdated infrastructure, increases pollution, noise – more cars, people, cats, dogs etc all of which impacts on our environment, countryside, estuary, wildlife and everyone's quality of life.</p> <p>Two developments, particularly, are causing us and, others, great concern and these are located in the area (yellow circle on map) that is missing from the proposed AONB extension. These are planning applications 15/01810/OUT (70 dwellings – North of Stour View Close, Mistley) and 14/01462/OUT (4 dwellings – junction of Stour View Avenue & Harwich Road, Mistley). In the photo below, the red lined area represents planning application 15/01810/OUT and the bright blue lined area represents 14/01462/OUT (already under construction – live site).</p> <ul style="list-style-type: none"> • ALTERNATIVE/PURPOSE BUILT ACCESS TO 15/01810/OUT <p>Application 15/01810/OUT includes a new access road located in the valley that provides fresh spring water to the estuary and wildlife in this area along with habitat used by various protected species. However, a purpose built access point to the development site already exists in Stour View Close. Please see below, the RSPB's (Mark Nower) objection to this development and his</p>	<p>running inland in several directions. Some parts have also been the subject of significant tree planting in recent years. Whilst Natural England agrees that there is little current intervisibility between some parts of this area, and the estuary influence is slight in summer, the northern part of the area is clearly part of the upper estuary slopes and within the zone of visual influence of the estuary. Whilst the area is largely hidden from views from the estuary and northern slopes in summer by tall vegetation alongside the railway, this is not the case in winter. In addition, many parts of this area are clearly visible from the roads which cross it. The area between New Mistley and the old railway line has visual interest in its own right, with pleasing visual compositions resulting from the changing tributary morphology, particularly as one moves through the area along the B1352 and the lane to Mistley Heath. Natural England considers that this small attractive area has a significant degree of natural beauty in its own right and is an important part of the estuary landscape and remains of the view that it should be included.</p> <p>Cii) The area between the disused railway line and Bradfield</p> <p>In relation to the area of land east of the disused railway to Bradfield, whilst Natural England agrees that there is a transition in both landscape character and quality southwards, it considers that this transition starts further inland, away from the estuary than the report suggests, at the top of the estuary slopes. The estuary slopes themselves may be a different landscape type from the estuary itself, but both landscape types are intrinsic to the estuarine landscape and as a result lie within the same character area, the slopes framing the waters of the estuary and forming a single visual unit. It is not considered that they should be treated as separate character areas in the way suggested by the Armstrong Rigg Report.</p> <p>In relation to the consultant's comment that this landscape does not of itself include significant attributes suggesting outstanding natural beauty, the technical assessment recognises that the estuary slopes in this area have been altered significantly to accommodate intensive agriculture and that it lacks specific attributes in its own right, having been affected by loss of landscape features and field amalgamations. However, the tributary valleys and varied geomorphology, together with the contrast between the framing woodlands on both sides and the pasture and arable areas within it mean that landscape quality remains high overall within the proposed boundary. The high levels of intervisibility with the estuary mean that the scenic qualities of this area are outstanding, with extensive panoramic views over much of the area, most of which lies within the zone of visual influence of the estuary.</p> <p>It is also considered that the report underplays the degree of intervisibility of this area with both the estuary and the northern estuary slopes and the degree of significance of these views. The viewpoint chosen to illustrate their view (Photograph 1, Court Farm) lies well inland on the north side of the estuary and on the edge of the area from which the area the respondents wish to see removed can be seen. Natural</p>

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	<p>comments below. There is clearly an “alternative solution” – a purpose built, existing access point. There is absolutely no need for a road in the valley. It is an unnecessary road proposed and granted by TDC! Essex County Council’s (ECC) involvement in this process is only to comment on highway regulations and whether any road put forward by TDC meets the necessary standard(s) – ECC do not decide on where a road is located (confirmed directly with ECC). The existing access point should be used but who can enforce this and how? TDC actually owns the piece of land that the existing; purpose built access is located on!</p> <ul style="list-style-type: none"> • BREEDING BIRD SURVEY – DONE AT THE WRONG TIME OF YEAR Mark Nower (RSPB) also comments that the breeding bird survey was conducted at the wrong time of year: • VALLEY IS BEING INFILLED – BY PLANNING APPLICATION 14/01462/OUT A major concern and one that, I am advised, has been brought to the attention of NE and the Environment Agency (EA), even though the area of the valley’s rill/stream does not form part of planning application 14/01462/OUT’s site, the construction firm (Rose’s) have been and, are, infilling the valley/spring. Below is confirmation email from a TDC: Dear Mrs Clarke, Thank you for your email. I apologise I haven’t been able to get back to you sooner. I have attended the site, taken the attached photos and spoken to the site manager, Steve Parker. Mr Parker has stated that the soil from the site has been placed at the back to infill the valley, raising the existing ground level. Unfortunately, this issue is not within Tendring District Council’s remit, but that of Essex County Council who I have copied into this email. I hope this assists, if you require any further assistance then don’t hesitate to contact me. Kind regards, Ben Bowler, Development Technician This matter was referred to ECC but, they have done nothing to stop this either. Tons and tons of soil, hardcore and brick rubble (from foundation trenches and, an enormous amount of infill from a piling mat/extra materials brought to site) have gone into the valley. This infill is not only to facilitate the building of a road in the valley, residents were advised at a parish council meeting, that consideration was being given to even more housing in the valley. • VALLEY ACCESS ROAD – OPENS UP FURTHER DEVELOPMENT LAND We feel and, suspect, that there is far more to this and the valley road has nothing to do with access to site 15/01810/OUT, especially as one already exists. Below is a plan of an old development application from the 1970s/80s for Stour View Avenue/Close and land to the East of 15/01810/OUT – Resurrecting the road in the valley provides access to more land to build even more houses. More housing brings more pressure on this sensitive area and the loss of the valley/rill. And, so long as we do not have an adopted LP, planning applications, that would otherwise have had little or no chance of being granted, will continue to be submitted and approved, either at local or government level. 	<p>England agrees that from Court Farm, the wooded slopes adjacent to Mistley are the key features on the estuary slopes and not the land behind the woods, however other more representative viewpoints such as from the Stour and Orwell promoted walk along the estuary between Newmill Lane and Stutton Ness, demonstrate that the area proposed for removal plays a very significant role in views from the estuary and northern slopes, to a far greater degree than Photograph 1 indicates. The area between New Mistley and Bradfield is considered to be an important component of the uninterrupted sweep of undeveloped rural estuary slopes from the edge of the recent development on the upper estuary slopes at Stourview Avenue, New Mistley all the way to Parkeston.</p> <p>Approaching from New Mistley or Mistley Heath along the Essex Way, there is a clear sense of arrival at the estuary landscape on crossing the area east of Mistley Heath. Natural England considers that these estuary slopes frame the estuary when viewed from both the estuary itself and also from the northern slopes of the estuary. The area has a very strong connection to the estuary landscape and sits well within the zone of visual influence of the estuary slopes. The undeveloped, rural estuary slopes are prominent in views and highly sensitive, clearly visible from both the estuary itself and its northern slopes. The high scenic qualities lift the natural beauty of the area above the level of wider countryside and it is of a similar character and quality to areas of northern estuary slopes within the existing AONB east of Harkstead. As a result, Natural England considers that the inclusion of this area remains justified.</p> <p>Natural England does not consider that the estuary slopes in this area are in the lower part of the zone of transition in quality. Natural England considers that the zone of transition in quality starts further south, at, or near, the rim of the estuary slopes and continues further southwards inland to Mill Lane as the estuary and tributary valley influences weaken and the wider plateau character starts to dominate. The transition in quality continues significantly further to the south than the current proposed boundary, which lies within the zone of visual influence of the estuary. The area lying within the boundary lies largely within the Stour Estuary Character Area, though owing to the way the character areas were drawn, some small areas of the East Tendring Plateau Character Area have also been included, where these retain estuary views and influence. Natural England remains of the view that the estuary slopes included within the proposed boundary lie within the higher quality end of the zone of transition in both character and quality.</p> <p>Ciii) Robustness of the Proposed Boundary Natural England agrees that the boundary proposed by Armstrong Rigg Planning, ie the route of the B1352, would offer a strong physical boundary which is continuous and clearly defined on the ground. It would however leave out significant areas of qualifying landscape to the south, which Natural England remains of the view should</p>

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	<p>An AONB designation does not stop development but, it will make sure that any proposed developments are strictly controlled, thoroughly scrutinised and limited. And, hopefully, ensure the involvement of those responsible for protecting our countryside, coast, wildlife and environment.</p> <p>We hope, following completion of the consultation, that additional land will be included in the extension. Something urgently needs to be done to help protect and retain the special and wonderful area that we are so lucky to have.</p> <p>Should you require any further information, please do not hesitate to contact me.</p> <p>Exclude areas BHLF-TK46-6MM2-B: Armstrong Rigg Planning: On behalf of Hopkins Homes, we are pleased to enclose with this letter a detailed assessment of the proposed AONB extension to the east of Mistley prepared by Aspect Landscape Planning. For the reasons set out in Aspect’s assessment, we are pleased to confirm that, while Hopkins Homes agrees with the Consultation submission that the Stour Estuary should be included within the wider Suffolk Coasts and Heaths AONB, they consider that the proposed new boundary should be adjusted between Mistley and Bradfield. The current boundary fails to create a robust and defensible boundary and includes large areas to the south of the B1352 that are demonstrated by Aspect to comprise a transitional landscape of lesser quality due to the largescale, industrialised agricultural fields that characterise the area. This area should therefore be removed from the proposed AONB extension with the boundary instead following the defensible boundary of the B1352 (as is the case to the east of Bradfield).</p> <p>Aspect have reviewed the Consultation Document and supporting evidence base, to assess whether the boundary of the proposed extension should be located as shown on Map 1 within Appendix 1, to the east of Mistley. As part of this assessment, Aspect have also visited the area in order to understand the landscape setting of the AONB extension and the setting of Mistley. The main issue, which this representation seeks to address, is: whether the boundary to the proposed AONB, to the south of the Stour Estuary, between New Mistley and Bradfield should be adopted as shown on the Natural England plans, or whether an alternative route should be defined?</p> <p>1. Baseline Assessment 1.1. The part of the proposed extension that is under review as part of this representation, is located to the east of New Mistley, where the proposed AONB boundary extends south from the railway line (which forms the southern extent of</p>	<p>be included. Other suitable boundary features were present in this area which enabled the inclusion of these highly prominent valley slopes.</p> <p>The types of features used for the boundary in this area, (largely the Essex Way Right of Way and other physical features, such as hedges and boundary fences) have been considered to be acceptable boundary features in past landscape designations, though it is accepted that they are somewhat weaker than public roads. The features selected are however listed in the hierarchy of acceptable boundary features recommended by Ordnance Survey and/or tested through use in past landscape designations and found to be sufficiently sound. Only two very short stretches of boundary features (hedges) immediately south of the railway line at Home Farm were discontinuous features and both only for a few metres. This is considered to be acceptable, since it allows the wider qualifying area to be included.</p> <p>The majority of the boundary through this area follows the Essex Way. This long distance recreational route is a clearly marked Right of Way, maintained in good condition and clearly visible on the ground as well as clearly marked and named on Ordnance Survey Explorer maps. Overall, Natural England is satisfied that the boundary in this area is sufficiently robust and defensible and enables the qualifying area of land to be included within the proposed boundary.</p> <p>Conclusion Natural England has considered the options suggested for both including additional land and removing land in this area. It remains of the view that the existing proposed boundary between New Mistley and Bradfield is suitable and sufficiently robust. It includes the higher quality areas of the estuary slopes with a strong visual link to the estuary and excludes land at the lower end of the transition in natural beauty in this area. No change to the boundary is proposed in relation to these submissions.</p>

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	<p>the proposed designation to the west), down to the Essex Way, which it then follows to the east, up to Bradfield. The boundary then follows the edge of this village before extending east, following the route of the B1352 Harwich Road.</p> <p>1.2. Mistley is located on the southern banks of the Stour Estuary, to the east of Manningtree. New Mistley comprises an area of post-war residential development that has extended east, along Harwich Road, to the south of the railway line that runs east – west between Harwich and Manningtree and the wider landscape to the west.</p> <p>1.3. The land to the east of New Mistley comprises a number of different land uses, with grazing land around the fringes of the settlement which then changes to arable extending to the east and south. An area of woodland lies just to the west of Bradfield located within a localised valley. The grazing land tends to be located within smaller, more organic field boundaries, while the arable land has been subject to the industrialisation of agriculture resulting in significantly larger, more geometric fields. This is evident on the historic mapping which shows the large fields, to the east of the disused railway that runs between Home Farm and Mistley Heath, divided into a number of much smaller parcels. Figure ALP1, below, illustrates the existing land uses to the east of New Mistley.</p> <p>1.4. To the north and north east of New Mistley, the land rises steeply from the estuary to around 15-20m AOD, with New Mistley elevated above the estuary. Mixed woodland defines the rising land, creating separation between the settlement and the estuary landscape to the north. To the north east of New Mistley, just to the west of Nether Hall, the rising land slackens, as a result of a localised watercourse, extending the flatter land south towards the B1352, but then steepens again to the north of Bradfield.</p> <p>1.5. The B1352 is the main east – west route through this landscape. As noted above, a railway line runs parallel to the coastline, again moving in an east – west direction. There is currently no public right of way along the coastline between Mistley and Bradfield. The Essex Way runs roughly parallel to the estuary (approximately 800m to the south of the shoreline), to the south of Mistley and New Mistley, between Manningtree and Bradfield. Apart from this route there are very few other public rights of way running through the landscape to the east of New Mistley.</p> <p>2. Review of Proposed AONB Boundary</p> <p>2.1. Within the SC&H AONB Extension Boundary Justification document (29.8.17), the land to the east of New Mistley falls into Section 3: New Mistley to Wrabness. The section of boundary is described as:</p>	

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	<p>“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.”</p> <p>2.2. The proposed boundary has been overlaid onto the aerial of the land to the east of New Mistley and is defined by the orange line. Refer to Figure ALP2.</p> <p>2.3. Under the section Boundary Considerations: Issues Influencing the Boundary Line, the justification document states that: “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...”</p> <p>2.4. It is noted that within the “Easily Distinguished Features” section, the assessment states that: “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.”</p>	

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	<p>2.5. Within the overall Evaluation document (September 2017), it is noted that the land to the east of New Mistley has been characterised as the “Stour Estuary” LCA and “East Tendring Plateau” LCA. The Plateau LCA broadly follows the 25-30m contour, with New Mistley, to the north of Harwich Road, and Bradfield located within the “Stour Estuary” LCA.</p> <p>2.6. The land to the east of New Mistley lies within the wider S5 Evaluation Area which covers the main estuary and southern slopes. The evaluation area largely reflects the Stour Estuary LCA, although the boundary does extend south to include some sections of the East Tendring Plateau. The area is assessed under the six attributes set out within the Natural England guidance, with the area described, under scenic quality, as: “This area of landscape comprises the expansive open water, mud-flats and saltmarsh of the estuary and the southern valley slopes between New Mistley and Parkeston Quay and is contiguous with the AONB boundary along the northern shores of the Stour. When viewed from within the existing AONB looking south, the southern shores form a matrix of woodland, arable and pasture, typical of estuary valley sides within the wider AONB, defining the Stour Estuary as a single landscape unit. The area has a strong visual unity, with the southern slopes forming the rural backdrop to the open waters of the estuary with trees often crowning the break of slope/skyline.”</p> <p>2.7. It is noted that within the conclusions of “Overall weight and spatial distribution of natural beauty evidence” the assessment states that: “There are some spatial variations in the weight of evidence of natural beauty. The valley slopes have been subject to intensive arable farming such that there are few remaining hedgerows, semi-natural habitats, archaeological or other landscape features. Nevertheless the upper slopes and the edge of the plateau afford elevated memorable views across to the northern shores and/or across open water and undulating valley sides where tributary valleys penetrate inland, and have a high scenic quality. Particular scrutiny will be required when defining the boundary to balance the need to draw the boundary conservatively and yet to identify a clear line on the ground, especially within an area of transition.”</p> <p>3. Assessment of Proposed AONB Extension Boundary</p> <p>3.1. Having reviewed the various documents submitted as part of the consultation submission, while Aspect agrees that the Stour Estuary should be incorporated into the Suffolk Coast & Heaths AONB, it is considered that the southern boundary, to the east of New Mistley, should be adjusted to exclude the area immediately to the east of the settlement which does little to contribute to</p>	

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	<p>the setting of the Estuary or the wider AONB, and instead follow a more defined boundary. The suggested alternative boundary is illustrated on Figure ALP3, which indicates the boundary suggested by NE (orange) and the alternative boundary suggested by Aspect (blue). As noted above, the NE Natural Beauty Assessment concludes that the southern boundary to the AONB Extension requires careful consideration.</p> <p>3.2. There are two key reasons why Aspect consider that the boundary should be redrawn:</p> <ol style="list-style-type: none"> 1. That the land is considered to be a transition area of a lower quality; and 2. That the suggested NE boundary is not as clearly defined on the ground. <p>3.3. NE set out within Appendix 4 of Natural England “Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England” (March 2011), as well as Table 3 of the Suffolk Coast & Heaths AONB: Boundary Variation Project – Consultation Document the boundary setting considerations for extensions to AONBs.</p> <p>3.4. Within this guidance eight factors are identified which should be considered during the setting of boundaries. It is considered that “other administrative boundaries”, “inclusion of settlements”, “splitting of settlement”, “incongruous development”, “proposed development” and “features of interest” are not relevant to this particular boundary review. The key considerations are “transition areas” and “types of boundary”.</p> <p>3.5. With regard to point 1, it is considered that the land to the east of New Mistley, to the south of the railway line, forms a transitional landscape between the landscape of the Estuary, and its shoreline, and the wider Plateau to the south. The land to the east of New Mistley reflects a variety of land uses, with the landscape becoming characterised by larger scale, more industrial agriculture to the east of the disused railway line.</p> <p>3.6. Within table 3 of the SC&H Consultation document, under “transition areas” it states:</p> <p>“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.”</p> <p>3.7. It is considered that the land to the south of the railway represents a transition area, with the more sensitive areas to the north (closest to the estuary) and quality reducing to the south as the large scale arable landscape becomes more prominent. While there is a degree of intervisibility between the slopes and</p>	

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	<p>the estuary to the north, this landscape, in itself, does not include any significant attributes that would suggest outstanding natural beauty. The southern slopes differ from those to the north which appear more wooded with parkland characteristics. 3.8. When viewed from the northern side of the Estuary, the wooded slopes to the north east of Home Farm, that extend east towards Nether Hall, are the key features that form a backdrop to the estuary and its shoreline. These features obscure the landscape to the south. This is illustrated in Photograph 1 below:</p> <p>3.9. It is concluded that the land to the south of the railway line between New Mistley and Bradfield represents a transitional landscape of a lesser quality and its inclusion does not materially contribute to the appreciation, or setting, of the Stour Estuary. Equally, its exclusion will not compromise the qualities of the wider Stour Estuary AONB extension.</p> <p>3.10. With regard to the second point, while the Essex Way appears to form a robust boundary when viewed in the context of an Ordnance Survey base, on the ground the route is characterised by an unploughed verge that crosses a large scale, arable field. While this may have been a field boundary in the past, the industrialisation of farming has resulted in the amalgamation of a number of fields to create a single, large arable parcel. The route, along which the proposed NE southern boundary will run is illustrated on Photograph 2 below.</p> <p>3.11. While it is acknowledged that there is intervisibility between the estuary and the northern slopes from the Essex Way, to the east of the dismantled railway, the landscape in the foreground is of limited merit in terms of natural beauty. The Essex Way would form the boundary to the AONB rather than being incorporated into the designation as an important feature. It is considered that the route, in this location, is not particularly defined and does not meet the definition of a “clear physical feature” as set out within the NE guidance. 3.12. It is noted that there is little or no intervisibility between the smaller scale paddocks, between Heath Road and the disused railway, and the estuary as a result of the mature vegetation structure that characterises the field boundaries. This parcel of land is also not evident within longer distance views across the estuary from the north.</p> <p>3.13. Aspect suggest that the Harwich Road forms the southern boundary to the AONB extension between New Mistley and Bradfield. From this route, to the east of the disused railway, there is intervisibility with the estuary and to the south west of Nether Hall the road sweeps down affording an appreciation of the shoreline to the north. The road forms a robust and defensible boundary to the</p>	

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	<p>designation between the two settlements, with Map 1 illustrating that the road corridor forms the southern boundary to the east of Bradfield. Photograph 3 shows the route of Harwich Road, to the east of the disused railway, between New Mistley and Bradfield.</p> <p>4. Conclusions</p> <p>4.1. As outlined above, Aspect agrees with the Consultation submission that the Stour Estuary should be included within the wider Suffolk Coast & Heaths AONB which extends to the north. However, it is considered that the proposed boundary, as suggested by Natural England, should be adjusted between New Mistley and Bradfield. Aspect recommend that the boundary is amended to follow Harwich Road between Home Farm and Bradfield. This forms a robust and defensible boundary to the designation in line with the Boundary Setting Considerations set out by Natural England. It is considered that the land to the south of the road corridor represents a transitional landscape of a lesser quality due to the large scale, industrialised agricultural landscape. This area should, therefore, be excluded from the AONB designation. The important wooded slopes and shoreline would remain part of the AONB forming the southern edge of the Stour Estuary landscape.</p>	
<p>Include additional land at Wrabness</p>	<p><u>Proposed Boundary Amendments</u></p> <p>Include additional areas BHLF-TK46-6MMP-9: Essex County Council strongly supports Natural England's (NE) proposal to extend the boundaries of the SCH AONB in the areas outlined in the consultation.</p> <ul style="list-style-type: none"> • ECC feels that there are additional areas, for which there is new evidence showing them to be worthy of inclusion, that should also be considered by Natural England in the Draft Designation Order when submitted to the Minister. • ECC fully supports the inclusion of additional areas into Essex as a result of this boundary variation project / consultation, and furthermore considers that the name of the AONB should be amended to reflect this in the Draft Designation Order when submitted to the Minister. <p>The inclusion of new areas which have been identified as being of AONB quality, into the SCH AONB are welcomed as they will bring new opportunities for conserving and enhancing the natural beauty of landscapes in Essex (as well as Suffolk). There is also the potential for there to be related economic and employment benefits within the extended areas.</p> <p>Essex County Council is aware of and has supported the decision taken by the AONB Partnership to commission its own consultants to review the consultation</p>	<p><u>Commentary</u></p> <p>Several responses were received suggesting the inclusion of varying areas of additional land around the village of Wrabness. To aid clarity these have been divided into two sub-themes shown below, each of which is considered separately:</p> <p>A) Include part of Wrabness village north of the railway line. B) Include the whole village and fields south of the village to the B1352</p> <p>A) Include Wrabness village north of the railway line BHLF-TK46-6MMP-9: Essex County Council, BHLF-TK46-6M9K-G: Tendring District Council, BHLF-TK46-6M9D-9: Suffolk Coast & Heaths AONB Partnership, BHLF-TK46-6M92-Q: The Dedham Vale AONB and Stour Valley Partnership.</p> <p>Two statutory consultees and both AONB Partnerships requested the inclusion of the part of the village of Wrabness which lies north of the railway and asked that the justification provided for this in the LDA report be considered. LDA propose the inclusion of this area of housing and use of the railway as a boundary feature. In light of the evidence in the LDA Report the inclusion of this area was re-considered.</p> <p>Natural England agrees with LDA that this small part of the village is in an area which is strongly associated with the estuary and lies within the Coastal Landscapes landscape character type in the Essex Landscape Character assessment which is largely included within the AONB boundary. However the LDA report goes on to state</p>

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	<p>material to guide not only the Partnership but also the component partners in their own responses. ECC has reflected on the report produced by, and the verbal communications held with, the appointed consultants and other partners, and believes that the additional work undertaken to be robust and this work therefore forms the basis of the ECC response. ECC has taken the decision to fully support the additional areas proposed for inclusion which are outlined fully in the response of the Suffolk Coast and Heaths AONB partnership response... It is requested that Natural England gives further consideration to the inclusion of these additional areas in the Draft Designation Order when submitted to the Minister... Wrabness: (see SC&H AONB Partnership response below for detail of arguments made.)</p> <p>BHLF-TK46-6M9K-G: Tendring District Council: In terms of the proposed changes to the position of the boundary between Middlebridge Creek and the railway bridges and the area around 'The House for Essex' in Wrabness Tendring District Councils view accords with that set out in the representation from the AONB partnership... In relation to the areas in the westernmost part of the Stour Estuary Evaluation Area and around 'The House for Essex' in Wrabness; that the boundary be repositioned as suggested in the representation from the AONB Manager on behalf of the AONB Partnership.</p> <p>BHLF-TK46-6M9D-9: In summary the Suffolk Coast & Heaths AONB Partnership Response is: • To welcome the proposals to extend the current boundary of the AONB • Request that Natural England reviews new evidence for areas that the AONB Partnership consider to be worthy for inclusion in any order to revise the AONB Boundary... This work has identified some additional areas that it considers worthy of the AONB designation... the Partnership consider that Natural England should consider this new evidence when making the draft order to extend the designation. The areas that the Suffolk Coast & Heaths AONB Partnership consider to be in need of further consideration are outlined below with justification drawn from a consultant's report (LDA Design) commissioned by the AONB team... Wrabness: The proposed boundary extension between Cook's Corner and Wrabness railway station is well placed. It follows an easily distinguishable permanent physical boundary feature which also reflects a broad change in landscape character and areas to the north which are visually associated with the Stour estuary from areas to the south which are not. The area east of Wrabness station is more complex and the boundary variation positioning reflects this. 'A House for Essex' is a nationally valued artwork and is included</p>	<p>that "At page 14 the 'Boundary Considerations' document appears to acknowledge that there is no specific reason to exclude the properties north of the railway line, commenting that: 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. This justification seeks to exclude these properties rather than considering the benefits of their inclusion."</p> <p>It is not in fact the case that there was no reason to exclude this area of housing. The rationale quoted by LDA above from the Boundary Considerations Assessment is not an admission that there is no reason to exclude them, but a rationale for how the relevant Boundary Setting Considerations in the Guidance have been given effect. These considerations relate to both the integrity of settlements and location within a tract of qualifying land as set out in the Guidance. The considerations stipulate that the integrity of settlements should be preserved, towns and villages should not be cut in two; and that settlements on the edge of a qualifying area should only be included if they lie in a wider tract of qualifying land. The Guidance further states that settlements should be judged on their individual merits, particularly on their character, qualities and relationship to adjoining countryside.</p> <p>Natural England considers that whilst as LDA state, there is a degree of separation between these properties and the rest of the village owing to the railway line, they do however form part of the same village. The railway line is also in cutting and not perceived as a significant barrier between the dwellings and wider village. The alternative boundary proposed by LDA following the railway line would provide a slightly less complex, pragmatic boundary and is a strong permanent physical feature, however the proposed boundary also follows sufficiently robust boundary lines, largely continuous property boundaries and fences and has the further advantage of not splitting the settlement.</p> <p>Natural England agrees that the small additional area proposed for inclusion lies in an area with a strong estuarine character and generally high scenic quality, towards the rim of the upper estuary slopes. However, the village was considered as a whole (in line with the Guidance), the settlement itself is not of a strong vernacular character overall and lacks historic interest. The technical assessment noted that much of the settlement (including much of the housing north of the railway line) is modern and makes little contribution to natural beauty.</p> <p>In considering the wider tract in which Wrabness sits, most of the settlement lies on the plateau in an area of plateau landscape with little estuary influence and surrounded on three sides by typical open arable plateau farmland which was assessed as not meeting the natural beauty criterion. Notwithstanding the small part</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>within the proposed AONB boundary variation, and the area of landscape north of the railway line within which this artwork is sited is strongly visually associated with the estuary and lies within the Coastal Landscapes landscape character type which is largely included within the proposed AONB boundary variation, refer to Figure 1. The small number of residential properties within this area are currently excluded from the AONB boundary variation. The properties are associated with Wrabness, but the railway line, un-adopted access road and change of character of the settlement create a separation from the core settlement – both physically and in character. At page 14 the ‘Boundary Considerations’ document appears to acknowledge that there is no specific reason to exclude the properties north of the railway line, commenting that: “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.” This justification seeks to exclude these properties rather than considering the benefits of their inclusion. Given their landscape setting, visual relationship to the Stour estuary, proximity to ‘A House for Essex’, and the detached character of the properties form (sic) the core settlement created by the railway line, there are good reasons to extend the designation to cover this small area. It is recommended that the proposed boundary variation follows the railway line in this section (as it does to either side) which would achieve a notably simpler, more easily distinguishable and permanent physical boundary in this area, as shown on Figure 2.</p> <p>BHLF-TK46-6M92-Q: The Dedham Vale AONB and Stour Valley Partnership: To welcome the proposals to extend the current boundary of the AONB... It notes that “the Suffolk Coast & Heaths AONB Partnership has suggested that Natural England look at new evidence procured by the AONB team identifying additional areas that meet AONB criteria. It considers that Natural England should consider adding these additional areas into any order created to revise the Suffolk Coast & Heaths AONB Boundary.” (Analyst note The additional area proposed by the Dedham Vale AONB at Wrabness is the same as that proposed by the SC&H AONB Partnership and detailed in the Suffolk Coast & Heaths AONB Partnership response above and not repeated here in order to minimise repetition).</p> <p>BHLF-TK46-6MDE-N: Boundaries in Wrabness and Ramsey should be extended southwards to the B1352. There are two anomalies in the proposed southern boundary... (2) Land in Wrabness between Dimbol's lane and Primrose Hill I have hatched these areas on the map (nb the map is attached to the paper copy of the response form at NE 47)</p>	<p>of the settlement on the upper estuary slopes, north of the railway, the settlement as a whole was not considered to lie within a high quality landscape. The land surrounding the main part of the village lying south of the railway comprises intensively farmed arable plateau with little to no association with the estuary. The exclusion of the settlement as a whole is thus compliant with the Guidance in relation to such settlements.</p> <p>No change to the boundary is proposed in relation to these submissions.</p> <p>B) Include the whole village and fields south of the village to the B1352 BHLF-TK46-6MDE-N: One respondent suggested that the boundary should be extended further south to include the whole village of Wrabness and an area of additional fields further south. No evidence was supplied to support this proposed addition. The reasons for the exclusion of the village of Wrabness are given in the section above, i.e. that the village itself is largely modern and does not make a contribution to the natural beauty of the area. The area of fields immediately to the south of the village was also assessed as not meeting the natural beauty criterion for the reasons given above.</p> <p>No change to the boundary is proposed in relation to this submission.</p> <p>Conclusion Natural England has considered the options suggested for including additional land at Wrabness. It remains of the view that the existing proposed boundary around the settlement is suitable and appropriate in the circumstances. It includes the higher quality areas of the estuary slopes and excludes the village of Wrabness in its entirety in line with the Natural England Guidance. No change to the boundary is proposed in relation to these submissions.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>Remove areas around Wrabness None</p>	
<p>Include / exclude land at Jacques Hall south of the railway</p>	<p><u>Proposed Boundary Amendments</u></p> <p>Remove areas from the proposed extension ANON-TK46-6MB2-Z: BL and JE Mitchell and sons, landowner. Although, as a modern working farm we would ideally prefer the AONB to not come within Ragmarsh Farm boundary, We cannot see why a new proposed boundary line should not keep to the shore line as it does before our farm, all the way from Manningtree/Mistley and possibly should then enlarge as it takes in Wrabness nature reserve.</p> <p>ANON-TK46-6MB7-5: BL and JE Mitchell and sons, landowner. There are already open footpaths from Bradfield in all directions and including paths already along the river bank and the road to the river. Its already a Nature zone with strict planning rules in place to protect the scenery. The boundty (sic) of the aonb should follow between the line of private land and the river.</p> <p>ANON-TK46-6MBT-2: BL and JE Mitchell and sons, landowner. The Proposed boundary should not affect the working lives of farmers or buisnesses (sic) or there (sic) assets the boundary should be set on crown land public owned spaces or trusts such as stour wood ect (sic) or private dwellings and not working farmland.</p>	<p><u>Commentary</u> Three respondents from the same farming business suggested that their land did not meet the criterion of outstanding natural beauty and that their land should be removed from the proposed extension. Two of the three objectors suggest the boundary should follow the shoreline to exclude all of their land.</p> <p>The rationale for the inclusion of this land is considered further in the section 4.3 Analysis of Qualitative responses relating to the Natural Beauty of the Proposed Stour Estuary Extension. This concluded that whilst the landscape and scenic qualities of the Ragmarsh Farm area are affected by intensive agriculture to a degree, the high quality views across the estuary landscape and the contribution of the area to the wider valley side land use patterns and thus scenic quality of the wider estuary as a whole, are considered to outweigh the impact of the intensive farming on parts of the estuary slopes in this area. On balance it was decided that the area should be included within the proposed extension.</p> <p>As suggested by two of the landowners, the proposed revised boundary following the shoreline, would be a strong, clear boundary, consistent with the treatment of the boundary to the west of this area which follows Mean High Water, however it would exclude a large area of the proposed extension whose inclusion was considered appropriate. In light of these responses, the line of the proposed boundary was reconsidered. Consideration was given to bringing the boundary further north to follow the railway line, but this would have excluded much of the area of upper estuary slopes which form an important component in views from the northern shores and which offer elevated memorable views of the estuary landscape in their own right, so was discounted. The current proposed boundary follows strong and robust features around this area, mostly the B1352, a C road to the railway at Wrabness and a few rear property fences at Bradfield. No change to the boundary is proposed.</p> <p><u>Conclusion</u> Natural England has considered the proposals to remove areas from the proposed extension in this area and considers that an appropriate balance has been struck. It is considered that the area included within the proposed Stour Estuary Extension meets the criterion for designation, it is desirable to do so and the existing proposed boundary is appropriate and sufficiently robust. No change to the proposed boundary is recommended in this area.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
<p>Extend boundary further south to include land north of B1352 between Stour and Copperas Woods</p>	<p><u>Proposed Boundary Amendments</u></p> <p>Include additional areas BHLF-TK46-6MDE-N: Boundaries in Wrabness and Ramsey should be extended southwards to the B1352. There are two anomalies in the proposed southern boundary: (1) Land in Ramsey to the south of Cambell's path {meadows & north facing} I have hatched these areas on the map. (nb the map is attached to the paper copy of the response form at NE 47)</p>	<p><u>Commentary</u></p> <p>One respondent suggested that the boundary should be extended further south to include land between Stour and Copperas Woods as far south as the B1352. No evidence was supplied to support this proposed addition. The reasons for the exclusion of this area were given in the Boundary Considerations Assessment. In summary the area comprises several small fields lying behind a row of modern houses at the limit of the estuary slopes. The area was considered to lack distinction, comprising largely flat plateau land and did not make a contribution to scenic land use patterns on the visible estuary slopes.</p> <p>Their inclusion would require the boundary to follow non-continuous rear property boundaries. On this basis it was concluded that the boundary should follow the more robust line of the continuous fence running alongside the railway property boundary as this is a clear feature on the ground.</p> <p><u>Conclusion</u></p> <p>Natural England has considered the proposal to include this area but considers that its inclusion is not appropriate and the proposed boundary in this area is sufficiently clear and robust. No change to the proposed boundary is recommended in this area.</p>
<p>Include / exclude more or less of the mouth of the estuary</p>	<p><u>Proposed Boundary Amendments</u></p> <p>Include additional areas ANON-TK46-6M93-R: We would also argue that Bathside Bay and Shotley Gate should be included... Both areas have great historic significance with the Naval School at Shotley and the areas of Old Harwich and Dovercourt. Bathside Bay provides a wilder area to complement the other side of this peninsula which has been used for bathing from the 1800s. It would also provide green space in an area which is enclosed by the Ferry Terminal to one side and the Harwich Port to the other.</p> <p>ANON-TK46-6MMU-E: Also the Bathside bay area close to Harwich currently a green area, close to developed areas but could afford those areas with additional countryside to enjoy would be any area to add... I would like to send examples of the current views etc which might be lost via email ... I would like to extend to cover Bathside bay near Harwich opposite Shotley. Also the Bathside bay area close to Harwich currently a green area, close to developed areas but could afford those areas with additional countryside to enjoy would be any area to add.</p> <p>ANON-TK46-6MMD-W: would also like Bathside Bay to be included near Harwich</p>	<p><u>Commentary</u></p> <p>The whole of the estuary landscape was included within the Study Area and fully assessed. At the estuary mouth there are a range of features of cultural and historic interest reflecting the long maritime heritage of the area, both on the north side of the estuary at Shotley Gate and on the south side at Harwich. These features add visual interest and were outlined in the technical assessment.</p> <p>In addition, the area of Bathside Bay is an important area for natural heritage, reflected in its inclusion in a range of national and international biodiversity designations. Overall however, landscape and scenic qualities of the area are significantly affected by the proximity and extent of Harwich, Dovercourt and Shotley Gates' modern developed character and the industrial nature of much of the area adjacent to the estuary on the south side.</p> <p>The area contains a range of incongruous features including the large container port of Felixtowe and international ferry complex at Parkeston and an oil refinery at Parkeston Quay. These features significantly undermine the level of natural beauty from land on both sides of the estuary in this area as well as from the open water at the mouth of the estuary and there is little sense of tranquillity. Whilst it is acknowledged that views from this area of the busy shipping activities are popular with visitors and striking, the area was not considered to meet the natural beauty criterion and was excluded from the Candidate Area. The inclusion of this area was</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>ANON-TK46-6M94-S: The protection of the river estuary as a whole should not be dependent on man made 'boundaries' - i.e. County boundaries. It is appropriate to include all of the river estuary not just parts of it.</p>	<p>re-considered in light of the suggestions for its inclusion but the original conclusion is still considered sound.</p> <p>ANON-TK46-6MMU-E and ANON-TK46-6M93-R: suggest that the area lies close to developed areas and could provide additional countryside or green areas between them for people to enjoy if they were included. Natural England agrees that these areas provide green infrastructure for local people, however, the opportunities for open air recreation available in this area are not a relevant consideration when assessing the natural beauty of areas for designation as AONB (though they are for national parks). Natural England considers that this area does not meet the natural beauty criterion for the reasons given above, and should thus not be included within the proposed extension. It considers that the management of the recreational use of the area, as well as that of the cultural and natural heritage features of the area are best managed through the existing relevant management mechanisms such as Local recreation strategies, Conservation Area, Listed Buildings and Biodiversity designations. These mechanisms should ensure the future enjoyment of this area by local people.</p> <p>ANON-TK46-6M94-S: The issue of where to cross the mouth of the estuary to include the higher quality areas west of Parkeston Quay was also re-considered in light of the suggestion that the County boundary was not appropriate. The Guidance makes clear that where administratively convenient boundaries follow suitable lines, it may be administratively convenient to adopt them if there are no other physical features present in the area. There is also precedent set in relation to other estuaries within AONBs where such features are used as boundary features.</p> <p>In this case, a boundary was sought to exclude the areas most affected by the port infrastructure. No suitable physical features cross the mouth of the estuary. Use of a straight line point to point boundary was considered but as there is a suitable administrative boundary (the County Constituency Boundary) this was preferred. Use of this administration boundary to where it intersects with Mean Low Water allows the exclusion of the lower quality areas to the east. It also coincides with the boundary of the various biodiversity designations in this area. Natural England remains of the view that this stretch of boundary follow appropriate features and that in this case the use of an administrative boundary as a boundary feature is appropriate.</p> <p>Conclusion Natural England has considered the proposal to change the boundary in this area and considers that the existing proposed boundary is appropriate. No change to the proposed boundary is recommended in relation to this submission.</p>

4.12 Analysis of Qualitative responses re. Boundary Considerations for the Proposed Samford Valley Extension

C10: Is the proposed boundary of the Samford Valley Extension appropriate?	
Yes	54
No	4
I am not sure	21

Summary Analysis of Responses

A significant majority of respondents (68%) who used the response form provided for question C10 agreed that the proposed boundary was appropriate. Some respondents (including the statutory consultees) submitted their response by letter or email. It was thus not possible to include their responses in the numeric summary table as they did not actually answer question C10, so the figures shown appear lower than the actual response rates overall. The consensus in non-questionnaire responses was also in favour of designation and there were

proposals for both the inclusion of additional land and the removal of land from the proposed extension.

Four of the seven statutory consultees indicated their general support for the designation of the land within the proposed extensions including the proposed Samford Valley extension. These 4 statutory consultees also requested amendments to the proposed boundary to include additional land as shown in the table below.

The SC&H and Dedham Vale AONB Partnerships also welcomed the proposals to extend the current boundary of the AONB, including the proposed Samford Valley Extension and indicated their support for the designation of the areas included within the proposals. They also requested the inclusion of additional areas, as shown in the table below.

Two landowners, a land agent and the CLA objected to the boundary of the Samford Valley Extension. The responses which were received were analysed and each theme raised is considered further in the table below with relevant text from responses extracted verbatim under the relevant theme heading.

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
Method	<p><u>Proposed Boundary Amendments</u></p> <p>Objecting to method ANON-TK46-6M9W-V: Much of the proposed extension is not visible, nor does it have access by the public and it has only been included we were told with use of satellite imagery. There are clearly some issues with the boundary as in the consultation document. I agree entirely with the statement that a “complex conservative boundary, which would enable the inclusion of areas of particular high quality, whilst excluding areas of low quality was more desirable than a simple pragmatic boundary line”. However Natural England have, in my view, shown a staggering display of an ill-conceived boundary, simply because they do not know what is on the ground, so they have drawn a line around areas that they think may fit their requirement and in doing so have diminished the high-quality of</p>	<p><u>Commentary</u></p> <p>Assessment of land which is not accessible ANON-TK46-6M9W-V: Land does not need to be fully accessible in order for a designation to proceed, in fact large parts of many AONBs do not have public access. As outlined in the Guidance, the process of assessing natural beauty and drawing a boundary around the qualifying areas draws on many sources of information both written and photographic and these are backed up by field assessment where access allows.</p> <p>The Samford Valley area as a whole does however have reasonable public access and good visibility was obtained over most of the area from both roads and other RoW to enable desk based assessment to be validated in the field. There is good inter-visibility along much of the valley, both from the surrounding lanes near the</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>the existing AONB, by the inclusion of very poor, low quality areas, something that they have stated in the consultation document, they were trying to avoid.</p>	<p>valley rim and also from the many Rights of Way (RoW) which cross it. The valley is crossed by six footpaths and a lane to the west of the railway; with additional RoW to the east of Brantham Bridge, including one which gives access along the valley floor. Although there are no further RoW crossing the valley floor west of Hustlers Grove, the valley slopes adjacent to the valley floor are visible from both Cutlers Lane and from the RoW south of Hill Farm.</p> <p>The technical assessment described why this area was considered to meet the criterion of natural beauty in some depth. The assessments were written up at length and in a transparent manner. The specific comments about the natural beauty of this area made by this and other objectors are included above in section 4.4, the analysis table for responses about natural beauty in this proposed extension. They are not considered further here.</p> <p>In relation to the accessibility of the area to enable a boundary to be drafted, Natural England considers that the site visits undertaken, in combination with the detailed scrutiny of recent aerial and satellite photographs of the area and other records detailed in the technical assessment and boundary considerations documents have enabled the development of a suitable conservative boundary around the proposed extension including higher quality land within the zone of visual influence of the valley.</p> <p>Conclusion Natural England remains of the view that the well-established method for assessing landscapes for designation as national park or AONB and developing a suitable boundary around qualifying areas is appropriate, has been followed during this project and that the findings in relation to the boundary are sound.</p>
<p>General Agreement</p>	<p>Supporting boundary</p> <p>BHLF-TK46-6M99-X: Babergh & Mid Suffolk District Councils: The Council welcomes the proposal to extend the boundary of the AONB southwards towards Essex and the inclusion of areas with Babergh.</p> <p>BHLF-TK46-6MME-X: Suffolk County Council: Suffolk County Council welcomes Natural England’s proposals to extend the boundaries of the SC&H AONB, but it considers that the proposal should be amended prior to the preparation of the draft Designation Order as described in the appendix to this letter (to include more land... see B19) The extension of the AONB is a once in a generation opportunity to ensure that the Suffolk Coast & Heaths includes all those areas that are worthy of designation...</p>	<p>Commentary</p> <p>A large majority of responses received in relation to the Samford proposed extension support the inclusion of the land within the proposed extension boundary.</p> <p>All the statutory respondents who commented on this proposed extension support the proposal to extend the AONB to include the area of the Samford Valley within the proposed boundary in its entirety. The Suffolk Coast and Heaths AONB Partnership and Dedham Vale AONB and Stour Valley Partnership also requested the inclusion of several areas of additional land. These are considered further below.</p> <p>9 additional respondents supplied comments in support of the proposed boundary.</p> <p>The CLA objected to the current boundary but did not supply a revised boundary proposal. They suggested that individual landowners should submit their own proposals for a revised boundary. One local landowner also objected to the</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>BHLF-TK46-6MDN-X: Ipswich Borough Council: The Council broadly supports proposals to extend the AONB into the candidate areas and thereby to support the conservation of the area's natural beauty</p> <p>BHLF-TK46-6MMP-9: Essex County Council strongly supports Natural England's (NE) proposal to extend the boundaries of the SCH AONB in the areas outlined in the consultation. ECC feels that there are additional areas, for which there is new evidence showing them to be worthy of inclusion, that should also be considered by Natural England in the draft Designation Order when submitted to the Minister. (see B19)</p> <p>BHLF-TK46-6MDX-8: This area includes a significant area of land in the Alton Ward I represent. The inclusion of parts of the Brantham Regeneration Area's open space provision is particularly welcome. Likewise the land on the south eastern boundary of the BUAB {assume 'Built Up Area Boundary'}.</p> <p>ANON-TK46-6MDW-7: Seems perfectly adequate to enhance the surrounding AONB.</p> <p>ANON-TK46-6M94-S: Proposed boundaries would help protect relatively unspoiled countryside and some protection against high density housing developments.</p> <p>ANON-TK46-6MBW-5: I agree with it and would if it got bigger too.</p> <p>ANON-TK46-6M9T-S: The proposed boundary includes the full extent of the valley and is appropriate to include all its landscape features.</p> <p>ANON-TK46-6MB9-7: gives clear and logical area to protect</p> <p>BHLF-TK46-6MMW-G: It seems to follow the valley sides and includes surrounding woodland without being compromised by transport arteries</p> <p>BHLF-TK46-6MBK-S: I approve of all three extensions to the A.O.N.B.</p> <p>BHLF-TK46-A12:R136MMR-B Yes we do as areas nearby are at risk of overdevelopment by builders which would detract from Suffolk's environment</p> <p><u>Objecting to boundary</u> ANON-TK46-6MDS-3: The boundary should be reconsidered but the CLA has encouraged members in the area to submit their own responses suggesting more appropriate boundaries, as they are the individuals who are best suited to make this important judgement.</p>	<p>boundary but did not supply any information about the nature of their objection or provide an alternative proposal.</p> <p>Two local landowners in the Samford area and the agent for two of the landowners, supplied alternative boundaries which would remove their land from the proposed variation. Their submissions and proposed boundary revisions are considered further below in the section entitled 'Include more or less land along the Samford Valley'.</p> <p><u>Conclusion</u></p> <p>A significant majority of responses considered the boundary of the proposed Samford Valley Extension to be appropriate. Requests for both the addition and removal of land were received. The information supplied in support of these changes is considered in the sections below.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
Support Boundary at Brantham / Cattawade	<p><u>Proposed Boundary Amendments</u></p> <p>Supporting Proposed Boundary BHLF-TK46-6M99-X: Babergh District Council: With respect to the revised extension to the AONB within the Babergh District the Council wishes to make the following comments: • (S2) East of Brantham built up area. The land includes part of the Brantham Strategic Policy Area as designated in the Babergh Core Strategy (Policy CS10) which has already been designated as an Open Space Area as part of planning permission (B/15/00263). This includes the Decoy Pond and the area round the sewage works. Decoy Pond is still actively fished by a local fishing club and their lease continues. The small sewage works are already adjacent to the existing AONB & are well screened. The (Natural Beauty Assessment 2017) report states the decoy pond area was “apparently ‘ruined’ when the Great Eastern railway cut through its immediate vicinity in the 19th Century.....has since deteriorated in condition, losing its characteristic decoy features”. However, in the final evaluation the inclusion of decoy pond is justified as “The duck decoy is a significant cultural heritage feature on the margin of the area”. The Pattles Fen, Brantham, was purchased by the village to celebrate the Millennium of 2000, has been much improved by the Woodland Trust. It is an attractive wooded recreational area sloping down to some boggy land at its base, supporting a lot of wildlife and is considered an asset.</p> <p>BHLF-TK46-6MDX-8: This area includes a significant area of land in the Alton Ward I represent. The inclusion of parts of the Brantham Regeneration Area's open space provision is particularly welcome. Likewise the land on the south eastern boundary of the BUAB (Built Up Area Boundary').</p>	<p><u>Commentary</u> Natural England welcomes the responses which are supportive of the case for the inclusion of this area.</p> <p><u>Conclusion</u> No change to the proposed boundary is recommended in this area.</p>
Include more or less land along the Samford Valley	<p><u>Proposed Boundary Amendments</u></p> <p>Include additional areas BHLF-TK46-6M9D-9: Suffolk Coast and Heaths AONB Partnership: In summary the response of the Partnership is: • To welcome the proposals to extend the current boundary of the AONB and • Request that Natural England reviews new evidence for areas that the AONB Partnership consider to be worthy for inclusion in any order to review the AONB boundary... The areas that the SC&H AONB Partnership consider to be in need of further consideration are outlined below with justification drawn from a consultant's report (LDA Design) commissioned by the AONB team.... 4. West of East End The proposed boundary variation leaves a narrow strip of undesignated land between the Suffolk Coast and Heaths AONB and Dedham Vale AONB (west of East End and east of East Bergholt). Inevitably any planning proposals within this</p>	<p><u>Commentary</u> A range of proposals for changes to the proposed boundary have been received requesting both the inclusion of significant additional neighbouring areas and the removal of the majority of the existing proposed extension. Parts of the arguments relating to these proposed boundary changes contain information relating to the natural beauty of large parts of the proposed extension rather than the boundary line itself. Comments related to natural beauty have been considered in the natural beauty analysis table for the Samford Valley extension in section 4.4 and that text is not repeated here. The proposed boundary changes are considered in turn below and have been divided into the following sub-themes: <u>Additions:</u> A) Include more land to the west of East End / Dodnash to align the boundary with that of the Dedham Vale AONB. B) Include more land west of Stutton to align with Bentley Lane. C) Include more land to identify a stronger boundary.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>area will need to be considered with respect of potential effects on the close proximity of these designated areas. The land within this area is not open plateau, or of such low value and scenic quality that it should definitely be excluded from the Suffolk Coast and Heaths AONB. It is also noted that both the Dedham Vale AONB and the proposed AONB variation boundaries already include land within the Plateau Farmlands landscape character type7 (refer to Figure 7).</p> <p>In order to better conserve and enhance the special qualities of both AONBs, the area of land shown on Figure 8, is judged appropriate to include within the Suffolk Coast and Heaths AONB. This area is clearly and robustly defined by landscape features comprising Mill Road and Putticks Lane in the west and field boundaries and the edge of woodland in the east. An area at the eastern edge of East Bergholt (West of Mill Road) has been excluded as this has been identified as potentially suitable for housing development. Outline application granted Feb 2018 for a mixed-use development including up to 75 dwellings. Ref.: B/16/01092. 5. West of Stutton</p> <p>In the majority of areas to the west and north, extending the proposed boundary variation to the nearest road would not result in a simpler boundary as the road pattern is complex and doing so would include land that does not meet AONB criteria. The exception to this is land to the west of Stutton, where the boundary of the AONB could be beneficially enlarged to follow Bentley Lane as shown on Figures 9 and 10. The area of land thus included is of a character already included within both the existing and proposed AONB (i.e. within the Plateau Estate Farmlands landscape character type 6). However, the proposed boundary in this location has potentially been defined to accommodate a preference for excluding the few buildings already in this area, or to exclude the area currently subject to a planning application for 14 dwellings (Babergh –DC/17/02111). The proposed local plan identifies this site as having been assessed in the SHELAA to be potentially suitable for development, but not currently developable.</p> <p>BHLF-TK46-6M92-Q: The Dedham Vale AONB and Stour Valley Partnership response is: To welcome the proposals to extend the current boundary of the AONB... It notes that “the Suffolk Coast & Heaths AONB Partnership has suggested that Natural England look at new evidence procured by the AONB team identifying additional areas that meet AONB criteria. It considers that Natural England should consider adding these additional areas into any order created to revise the Suffolk Coast & Heaths AONB Boundary.” These additional areas are outlined in the Suffolk Coast & Heaths AONB Partnership response above and not repeated here in order to minimise repetition.</p> <p>BHLF-TK46-6M99-X Babergh and Mid Suffolk District Councils: The Council welcomes the proposal to extend the boundary of the AONB southwards towards Essex and the inclusion of areas with (sic) Babergh. With respect to the revised</p>	<p>Deletions: D) Remove all land west of the railway or A137 E) Remove all land west of the railway and south of the brook F) Exclude land to ensure a more conservative boundary</p> <p>Additions A) Include more land to the west of East End / Dodnash to align the boundary with that of the Dedham Vale AONB. BHLF-TK46-6M9D-9: Suffolk Coast and Heaths AONB Partnership, BHLF-TK46-6M92-Q: The Dedham Vale AONB and Stour Valley Partnership, BHLF-TK46-6M99-X Babergh and Mid Suffolk District Councils, BHLF-TK46-6MME-X: Suffolk County Council, BHLF-TK46-6MMP-9: Essex County Council, ANON-TK46-6MDZ-A, ANON-TK46-6MMH-1, BHLF-TK46-6MMX-H: The Suffolk Preservation Society (SPS).</p> <p>Whilst agreeing with the designation of the land within the proposed Samford Valley extension, three of the statutory consultees, both AONB Partnerships and three other respondents requested the inclusion of the same area of additional land to the west of East End village. Two other respondents, ANON-TK46-6M9W-V and ANON-TK46-6M9R-Q, also stated that this same area did not meet the criterion for natural beauty.</p> <p>In light of the additional, varying evidence supplied by these respondents, the original assessment of this area was reviewed. The area comprises the strip of agricultural land lying either side of East End Road between the edge of the proposed extension adjacent to East End village and the existing Dedham Vale AONB towards East Bergholt village.</p> <p>This area comprises an area of predominantly large, open, flat arable fields with a few smaller fields in the vicinity of Woodlands and Manor Farms and the Grange in the East. It has undergone significant field boundary rationalisation resulting in a simplification of the landscape which overall, has a modern, busy arable nature. The fields immediately adjacent to the proposed extension retain some views of the upper parts of the Samford Valley but lie on the surrounding plateau and the quality of this area is affected by the impact of the intensive arable agriculture.</p> <p>Parts of the area immediately adjacent to the Dedham Vale AONB boundary near Home Farm retain more of an estate feel and benefit from tall thick hedges and small woods and the visual influence of the wooded area of neighbouring estate land within the existing Dedham Vale AONB boundary. However this area is small and separated from the proposed extension by the strip of large open arable fields which border the Samford Valley extension.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>extension to the AONB within the Babergh District the Council wishes to make the following comments: East of the A137, the area including Vale Farm and White House Farm is identified as a good demonstration of the plateau farmland landscape character. The majority of this landscape character which sits within the Babergh District has been included within the proposed extension. There are two reasons to support inclusion of this section. The first is that its beauty is not as apparent from the outside looking in as it is from the inside looking out. Down the tracks and rough roads of this area are some really charming places. The second is that it forms the connection to the rest of the Samford Valley across the A137. The contiguous nature of the entire proposal is part of the reason for some of the proposed inclusions...</p> <ul style="list-style-type: none"> • With respect to the Focussed Review from LDA Design commissioned by the AONB Partnership the Council supports the recommendations in the report to extend the boundary in Babergh in the following areas: <ul style="list-style-type: none"> o The additional extension proposed to the west of Dodnash so aligning the boundary with that of the Dedham Vale AONB. o The proposed additional extension at Stutton to align with Bentley Lane. <p>BHLF-TK46-6MME-X: Suffolk County Council welcomes Natural England's proposals to extend the boundaries of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty, but it considers that the proposal should be amended prior to the preparation of the Draft Designation Order as described in the appendix to this letter. This is because the Council considers that there are significant opportunities for Suffolk afforded by the extension of the AONB and that these should be maximised...The AONB Unit has commissioned a study from landscape consultancy LDA Design, to review the extension proposals put forward by Natural England. This is intended to inform the response of the AONB Partnership and the response individual partners, should they wish to use it. This is the source of the evidence that the Council wishes Natural England to consider. The details are set out in the appendix to this letter. The remaining text of the response repeats the text included above in the AONB Partnership Response in relation to the areas West of East End and West of Stutton, so is not repeated here.</p> <p>BHLF-TK46-6MMP-9: Essex County Council strongly supports Natural England's (NE) proposal to extend the boundaries of the SCH AONB in the areas outlined in the consultation. ECC feels that there are additional areas, for which there is new evidence showing them to be worthy of inclusion, that should also be considered by Natural England in the Draft Designation Order when submitted to the Minister. The remaining text in the response repeats the text above in the AONB Partnership response in relation to the areas West of East End and West of Stutton.</p>	<p>Overall the proposed addition lacks the complex tributary valley morphology, small fields and woods and other features of the area within the proposed extension and described in the technical assessment. Whilst a pleasant rural area, this additional land makes little contribution to the natural beauty of the area proposed for designation and contains no features of cultural or natural heritage interest which might add weight to its inclusion.</p> <p>It is agreed that the area lies within the Plateau Estate Farmlands character type in the Suffolk LCA, parts of which lie in the existing Dedham Vale AONB and in the proposed extension, however landscape type is not necessarily an indicator of the degree of natural beauty. The evaluation and site visits revealed that it is a transitional area, where the wooded estate character of the adjacent part of the Dedham Vale AONB is in transition to the more typical open arable character of the wider Shotley Peninsula Plateau Character Area, part of which lies between and immediately adjacent to the proposed Samford Valley extension in this area.</p> <p>In this area, landscape and scenic quality are declining and lack the highly attractive valley morphology, cultural and natural features of interest and tranquillity found within the proposed extension. It is considered that the area is at the lower end of the transition in landscape and scenic quality, as the valley influence is progressively lost away from the valley rim.</p> <p>The current proposed boundary does not follow landscape character area boundaries. Whilst it largely includes the Samford Valley Character Area, it also includes some parts of the Shotley Peninsula Plateau Character Area where site visits revealed that these areas retained a strong valley slope influence and were of higher quality.</p> <p>Overall, Natural England agrees with the two respondents who stated that the additional area proposed for inclusion in the proposed extension to the west of East End does not meet the natural beauty criterion.</p> <p>The proponents of the inclusion of this additional area also state that planning proposals within this area will need to be considered with respect to potential effects on the close proximity of the designated areas. Natural England agrees that this is the case, but considers that this is not a reason to include land which does not meet the natural beauty criterion in its own right. It is not normal practice to include 'the setting' of an AONB within the proposed boundary. The Guidance states that the boundary should be drawn tightly around the area of highest quality, excluding areas of lower quality. Natural England remains of the view that the area of highest quality has been included within the proposed extension and that this lower quality transitional area should remain outside the proposed extension. The exclusion of this area from the proposed extension will not preclude the local authorities from</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>ANON-TK46-6MDZ-A: The area chosen includes most land of significant landscape merit, but additional land to the South West would make a better unit taken together with the Dedham Vale AONB.</p> <p>ANON-TK46-6MM4-D: Should follow roadway and not hedgerows.</p> <p>ANON-TK46-6MMH-1: I also support the AONB Partnership's submission to include the area #4 'West of East End' as it provides another point of contact between the Suffolk Coast and Heaths AONB and the Dedham Vale AONB.</p> <p>BHLF-TK46-6MMX-H: The Suffolk Preservation Society (SPS).....Our comments to the consultation are limited to the extensions which impact on the landscape of Suffolk... Overall SPS welcomes the proposed extension of the AONB designated area which will extend the degree of protection afforded to scenic landscapes of the county and offers an opportunity to conserve and enhance the additional areas.</p> <p>Samford Valley Extension - area between East Bergholt and East End: The proposed extension at East End will result in a narrow strip of undesignated land between the Suffolk Coast and Heaths and the Dedham Vale AONBs. This land will be within the setting of both AONBs and therefore consideration of any future development proposals will need to assess the impact on the AONBs. We consider that the landscape at this point is of sufficient quality to be included within the designated area which would result in a clearer understanding of the value of this landscape and the better conservation and enhancement of the special qualities of both AONBs.</p> <p>Samford Valley Extension – boundary at Stutton: SPS questions the proposed eastern boundary of the Samford Valley extension area at Stutton which has been drawn to exclude existing dwellings. We consider that this area should be extended to Bentley Lane as the landscape around Holly Farm and Woodfield Lane is a tranquil area of scenic beauty which merits inclusion.</p> <p>ANON-TK46-6M96-U: I am disappointed that the wonderful woodlands north of Bentley have not been included but do not challenge the boundary.</p> <p>Remove areas from the proposed extension</p> <p>ANON-TK46-6MDS-3: CLA: As discussed above, the transitional nature of the area to the far west of the Samford Valley and the subsequent impact this has, along with the incongruous features, upon the natural beauty has been largely overlooked. Although some efforts have been made by Natural England to draw the boundary back, the boundary is still not conservative enough. The inclusion of</p>	<p>considering the effect of future development proposals on the AONB. No amendment to the boundary in this area is recommended.</p> <p>B) Include more land west of Stutton to align with Bentley Lane. BHLF-TK46-6M9D-9: Suffolk Coast and Heaths AONB Partnership, BHLF-TK46-6M92-Q: The Dedham Vale AONB and Stour Valley Partnership, BHLF-TK46-6M99-X Babergh and Mid Suffolk District Councils, BHLF-TK46-6MME-X: Suffolk County Council, BHLF-TK46-6MMP-9: Essex County Council, BHLF-TK46-6MMX-H: The Suffolk Preservation Society.</p> <p>Three of the statutory consultees, both AONB Partnerships and the Suffolk Preservation Society requested the inclusion of the same area of additional land to the west of Stutton village. The original assessment of this area was reviewed in light of the additional evidence supplied by these respondents. The area comprises an area of 20th Century housing called Upper Street adjacent to the currently proposed boundary and an area of fields bounded by Bentley Lane in the east. The proposed boundary was drawn to leave the existing AONB boundary at a point where the Samford Valley influence is lost, immediately adjacent to the settlement of Upper Street. The suggested addition would extend the area further east onto the plateau.</p> <p>It is agreed that the suggested addition lies within the Plateau Estate Farmlands character type in the Suffolk LCA, parts of which lie in the existing Dedham Vale AONB and in the proposed extension, however as stated above, landscape type is not necessarily an indicator of the degree of natural beauty. The evaluation and site visits revealed that this is a transitional area, where the Samford Valley character of the proposed extension is in transition to the more typical open, arable plateau Shotley Peninsula Plateau. Within the proposed addition, only the fields in the west retain any valley influence and most of the proposed addition is flat plateau landscape. The area is also of lower landscape and scenic quality for a range of reasons which are outlined in the natural beauty assessment.</p> <p>The area of housing at Upper Street proposed for inclusion is of a modern character which does not reflect the local vernacular and is not considered to make a positive contribution to natural beauty.</p> <p>The area to the east of Upper Street is largely flat and of a typical plateau character. It is a pleasant, tranquil agricultural area but lacks the complex valley form, woodlands and other features which lift the quality of the land within the proposed extension above that of the surrounding area.</p> <p>It is acknowledged that the group of smaller arable fields south of Holly Farm on the western edge of the proposed addition retain some views of the upper parts of the Samford Valley and have a sloping nature in places. The inclusion of these parts of</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>this land will dilute the quality of the AONB as a whole. There is a lack of evidence of consensus or need to improve conservation efforts in this area. Overall therefore the CLA do not agree with the proposed boundary. The boundary should be reconsidered but the CLA has encouraged members in the area to submit their own responses suggesting more appropriate boundaries, as they are the individuals who are best suited to make this important judgement.</p> <p>ANON-TK46-6M9R-Q: Mark westward Ltd Response: To maintain the existing high quality of this AONB the boundary extension should only be up to the Railway line and everything to the west of it should be excluded The Dodnash wood area already has its own special landscape area designation so no need to more layers of 'designation' (sic).</p> <p>ANON-TK46-6M9W-V: Much of the proposed extension is not visible, nor does it have access by the public and it has only been included we were told with use of satellite imagery. There are clearly some issues with the boundary as in the consultation document. I agree entirely with the statement that a “complex conservative boundary, which would enable the inclusion of areas of particular high quality, whilst excluding areas of low quality was more desirable than a simple pragmatic boundary line”. However Natural England have, in my view, shown a staggering display of an ill-conceived boundary, simply because they do not know what is on the ground, so they have drawn a line around areas that they think may fit their requirement and in doing so have diminished the high-quality of the existing AONB, by the inclusion of very poor, low quality areas, something that they have stated in the consultation document, they were trying to avoid.</p> <p>The consultation document states that the area of land between the Dedham Vale AONB and this proposed extension does not meet the natural beauty criteria. I agree with this statement. However, the proposed extension, particularly at the Western end now includes large chunks of land very similar in character to the area between the two AONBs. This "padding out" of the tiny area of pretty, not outstandingly beautiful, land makes a mockery of existing, deserving AONB's which will not survive in the long term if they diluted by areas such as this .</p> <p>BHLF-TK46-6MMB-U: Of the huge area originally considered this small linear proposed extension does not link or enhance with the existing Dedham Vale or Suffolk Coast and Heaths AONB. The existing AONB's are outstanding in their block with views covering the Stour Valley/ Estuary features but the small valley of Dodnash Brook is rather poky, small, narrow and suburban, the boundary winds around every potential development taking place and proposed in East Bergholt (Mill Road 78 house development), East End (Manor Farm proposed 15 house site), Brantham (houses built along A137) and Bentley (Garden Centre development site and adjoining field) which is going to impact on the proposed</p>	<p>the proposed additional area was considered during the initial boundary setting which concluded they lie in the lower part of the transition in natural beauty in an area where the valley influence lessens and the lower quality flat arable plateau character becomes stronger.</p> <p>Part of the proposed boundary follows Bentley Lane around a higher quality area containing the head of a small tributary valley system, attractive woodlands and new hedge planting immediately north of the proposed addition. This area was included after the informal consultation. It is acknowledged that this road is a strong boundary feature, however continuing along it to include the whole of the proposed additional area would mean including a transitional area comprising large, flat arable fields and Upper Street. Further consideration was given to including the area of smaller fields south of Holly Farm, which have some valley influence, but on balance, it was felt that a conservative boundary drawn to exclude areas towards the lower end of the transition in landscape and scenic quality was preferable and that the boundary should not be amended in this area.</p> <p>C) Include more land to identify a stronger boundary ANON-TK46-6MM4-D, In relation to the suggestion that the boundary should follow roads not hedgerows, it is acknowledged that roads form particularly strong boundary features, however using surrounding roads such as East End Road as a proposed boundary would require the inclusion of land which has been assessed as either not meeting the natural beauty criterion or being at the lower end of the transition in landscape and scenic quality. This issue was considered in the desirability assessment and it was concluded that a more complex conservative boundary around the Samford Valley extension, which excluded lower quality areas was more desirable than a simple pragmatic one. A conservative boundary was thus developed which included only the higher quality areas. Whilst following roads would have made a more robust boundary, the features used are generally of a type listed as appropriate in the Ordnance Survey Hierarchy of boundary features or established as appropriate through past precedent. No further amendment to the boundary is proposed in this area.</p> <p><u>Deletions</u></p> <p>D) Remove all land west of the railway or A137</p> <p>ANON-TK46-6M9R-Q: Mark westward Ltd Response, BHLF-TK46-6MMB-U: These two respondents suggested that no land west of either the A137 or railway should be included, in order to maintain the existing high quality of this AONB. The evidence supplied in support of this proposed deletion of land mostly related to the level of natural beauty of the area within the proposed extension. This was considered in Section 4.4 Analysis of Qualitative responses in relation to natural beauty and is not repeated here. Both the railway and the road would have provided very robust boundary features to follow, but doing so would have meant the</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>area, down grading it to no specific beauty. I would strong (sic) argue that the Samford Valley Extension west of A137 should not be included at all.</p>	<p>exclusion of a large qualifying area to the west. This proposed extension was re-considered in detail and it was concluded that the area proposed for deletion has sufficient natural beauty; that its designation was desirable and that whilst complex, the boundary still followed sufficiently robust features. No amendment to the boundary in this area is recommended.</p> <p>E) Remove all land west of the railway and south of the brook ANON-TK46-6M9W-V: One respondent suggested that all of the proposed extension lying west of the railway and south of the brook should be removed from the proposed extension and suggested that only the slopes and woods north of the brook running west from the railway to the edge of Kings Field might be included in the proposed extension.</p> <p>This amendment would result in the splitting of the valley landscape both across the valley and along its centre line, following the line of the brook along the middle of the valley, and resulting in a revised extension containing less than half of the valley landscape west of the railway, and including only the larger woodlands and valley slopes north of the brook.</p> <p>Neither the map nor the text supplied by this respondent provided a justification for this proposed amendment to the actual boundary line, though comments were made about the degree of natural beauty in the area suggested for removal from the proposed extension. The comments in relation to natural beauty are considered above in Section 4.4 Analysis of Qualitative responses in relation to natural beauty.</p> <p>Natural England does not agree that the proposed extension contains “very poor, low quality areas”. As described in the technical assessment, overall the valley system exhibits a high level of natural beauty owing to the combination of its attractive tributary valley morphology, small fields, areas of pasture and active management of traditional features, hedges, trees and features of interest such as vernacular farm buildings, priority habitats and wildlife, as described in the original assessments. The area has a strong sense of visual unity as a tributary valley landscape, with considerable intervisibility along both sides of the valley and its full length, to where it joins the existing AONB. It is not considered that the valley bottom and slopes lie in the zone of transition to a lower quality landscape. This transition begins on the rim of the valley landscape and continues onto the surrounding plateau until the valley influence is lost on the plateau proper.</p> <p>The proposed boundary contains only the higher quality areas within the zone of transitions in landscape and scenic quality such as the extensive woodlands which continue onto the plateau in some areas. The impact of the incongruous features present was also reconsidered as described in Section 4.4 and it was concluded</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
		<p>that whilst they have a local impact they do not undermine the ability of the Samford Valley as a whole to meet the natural beauty criterion.</p> <p>Considerable time was spent on the ground revisiting the findings of the original assessments for this proposed extension. Natural England remains of the view that both sides of the valley landscape are of significant natural beauty for the reasons described in the original assessment, not just the woodlands. The proposed amendment would remove very significant qualifying areas from the proposed extension and would not provide a boundary which is more robust than the existing line.</p> <p>The re-evaluation concluded that all of the area within the proposed extension is of sufficient natural beauty to warrant designation, that its designation is desirable and that the boundary is sufficiently robust and in line with the Guidance on boundary setting. No amendment to the boundary in this area is recommended.</p> <p>F) Exclude land to ensure more conservative boundary ANON-TK46-6MDS-3: CLA stated that although some efforts have been made by Natural England to draw the boundary back, the boundary is still not conservative enough. This respondent provided evidence that the proposed Samford extension did not have sufficient natural beauty to warrant designation in support of this suggestion to amend the proposed boundary. This evidence was considered above in Section 4.4 Analysis of Qualitative responses in relation to natural beauty. No evidence was supplied for a new, more conservative boundary. As stated above, Natural England has reviewed the evidence in relation to this proposed extension at length. It is concluded that the amendments made to the proposed boundary of the Samford Valley extension after the informal consultation have removed some areas which might be considered to be at the lower end of the transition in natural beauty in the area surrounding the Samford Valley. No further amendment to the boundary in this area is recommended.</p> <p>Conclusion Natural England has considered the range of proposals to both include additional areas around this proposed extension and to remove areas from within it. Natural England considers that an appropriate balance has been struck and that the area included within the proposed Samford Valley Extension meets the criterion for designation, that it is desirable to do so and that the existing proposed boundary is appropriate and sufficiently robust. No change to the proposed boundary is recommended in this area.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
<p>Include valley north of Holbrook Gardens and Fish ponds towards Grove Farm</p>	<p><u>Proposed Boundary Amendments</u> ANON-TK46-6M5D-5: Consider extending the AONB further up the valley towards Grove Farm from the fish ponds and Holbrook Gardens to include the stream and ponds on this beautiful and unique part of the Shotley Peninsula which is under threat from encroaching housing development with a risk of affecting water supply to these ancient fish ponds.</p>	<p><u>Commentary</u> This area was re-visited and re-evaluated in light of the response suggesting its inclusion. The area is a small, narrow tributary valley running into the designed landscape of Holbrook Gardens (which lies immediately adjacent, within the existing AONB boundary). The valley itself has a largely attractive agricultural character with a degree of scenic quality owing primarily to the valley morphology, which adds visual interest. It also contains areas of permanent pasture and the valley floor contains several non-designated historic fish ponds, though these are now in declining condition and have lost their visual association with the adjacent designed landscape inside the AONB boundary owing to the development of secondary woodland in this latter area. The thin strip of permanent pasture is surrounded by large typical plateau arable fields on all sides, some of which continue down onto the shallow valley slopes in places, affecting landscape and scenic quality.</p> <p>The open nature of the surrounding plateau area and the shallowness of the valley morphology also mean that landscape and scenic quality are affected by the hard edge of the recent large extension to the village of Holbrook which lies in the neighbouring fields. This development on the edge of the adjacent plateau, significantly overlooks the area, reducing the scenic quality and tranquillity of the area. Overall, the area is not considered to sufficiently meet the criterion of outstanding natural beauty to warrant designation.</p> <p><u>Conclusion</u> No change to the boundary is recommended in this area.</p>
<p>Include whole of Shotley Peninsula</p>	<p><u>Proposed Boundary Amendments</u></p> <p><u>Supporting Proposed Boundary</u> ANON-TK46-6M9A-6: Although I would like to see the whole of the Shotley Peninsula's Special Project area upgraded to AONB, I understand that Natural England has strict criteria and adheres rigorously to them when carrying out assessments. Any extension is welcome.</p> <p><u>Include additional areas</u> ANON-TK46-6M9H-D: We think that the Shotley Peninsula project area of the Suffolk Coasts and Heaths AONB should be included in the actual AONB so the entire Shotley Peninsula is included. It is a unique and very special area.</p> <p>ANON-TK46-6MB6-4: Obviously we would like to see a much wider area designated. Such as the whole of the Shotley Peninsula.</p>	<p><u>Commentary</u> The natural beauty of the whole of the area of the Shotley Peninsula which lies within the Additional Project Area identified by the SC&H AONB Partnership was evaluated. The results of the evaluation are documented in the technical assessment of natural beauty. Natural England remains of the view that whilst some areas of the Shotley Peninsula meet the criterion of outstanding natural beauty and that their designation was desirable, other areas did not; and that the areas of the Shotley Peninsula which warrant designation have been included within the three proposed extensions.</p> <p><u>Conclusion</u> No change to the boundary is recommended in this area.</p>

4.13 Analysis of Qualitative Responses relating to Boundary Considerations for the Proposed Freston Brook Extension

C15: Is the proposed boundary of the Freston Brook Extension appropriate?	
Yes	65
No	1
Note sure	0

Summary Analysis of Responses

A large majority of respondents (98%) who used the response form provided for question C15 agreed that the proposed boundary was appropriate. Some respondents (including the statutory consultees) submitted their response by letter or email. It was thus not possible to include their responses in the numeric summary table as they did not actually answer question C15, so the figures shown appear lower than the actual response rates overall. The consensus in non-questionnaire responses was also in favour of designation, with only one formal

objection to the proposed boundary (from the Stour Preservation Society) and two requests for the inclusion of additional areas received in these formats.

Two of the seven statutory consultees (Suffolk and Essex County Councils) indicated their general support for the designation of the proposed extensions including the proposed Freston Brook extension, but without making any comments on the boundary of this proposed extension. Two statutory consultees (Ipswich Borough Council and Babergh and Mid-Suffolk District Council) requested amendment of the proposed boundary to include additional land as shown in the table below.

The SC&H and Dedham Vale AONB Partnerships also welcomed the proposals to extend the current boundary of the AONB, including the proposed Freston Brook Extension and indicated their support for the designation of the areas included within the proposals. They did not offer any detailed comments on the proposed boundary or request the inclusion or removal of any additional areas.

The on-line respondent who objected to the proposed boundary supported the designation of the proposed extension but requested the inclusion of more land. One objector in writing (Suffolk Preservation Society) requested the removal of an area from the proposed extension. No landowners objected to the Freston Brook Extension. The CLA did not object to this proposed extension and provided no comments in relation to it.

Few respondents (apart from the four respondents who wished to see the boundary amended) gave reasons for their views in relation to the boundary of this area.

All responses were analysed and each theme raised is considered further in the table below, with relevant text from responses extracted verbatim under the relevant theme heading.

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
<p>General Support</p>	<p><u>Supporting boundary</u></p> <p>BHLF-TK46-6M99-X: Babergh & Mid Suffolk District Council: The Council welcomes the proposal to extend the boundary of the AONB southwards towards Essex and the inclusion of areas within Babergh.</p> <p>BHLF-TK46-6MME-X: Suffolk County Council: Suffolk County Council welcomes Natural England’s proposals to extend the boundaries of the SC&H AONB... The extension of the AONB is a once in a generation opportunity to ensure that the Suffolk Coast & Heaths includes all those areas that are worthy of designation.</p> <p>BHLF-TK46-6MDN-X: Ipswich Borough Council: The Council broadly supports proposals to extend the AONB into the candidate areas and thereby to support the conservation of the area’s natural beauty</p> <p>BHLF-TK46-6MMP-9: Essex County Council strongly supports Natural England’s (NE) proposal to extend the boundaries of the SCH AONB in the areas outlined in the consultation.</p> <p>BHLF-TK46-6M9D-9: In summary the Suffolk Coast & Heaths AONB Partnership Response is:</p> <ul style="list-style-type: none"> • To welcome the proposals to extend the current boundary of the AONB <p>BHLF-TK46-6M92-Q: The Dedham Vale AONB and Stour Valley Partnership Response is: To welcome the proposals to extend the current boundary of the AONB. The Dedham Vale AONB and Stour Valley Partnership recognises that the Suffolk Coast & Heaths AONB Partnership has had an ambition for a boundary review for over 20 years. It welcomes the boundary review that Natural England are undertaking. It notes that its own aspiration for boundary review was submitted to Natural England in 2009... The potential inclusion of new areas into the Suffolk Coast & Heaths AONB will bring new opportunities for conserving and enhancing the natural beauty of landscapes in Suffolk and Essex. It is noted that these areas have been identified as being of AONB quality and such a designation would be desirable.</p> <p>BHLF-TK46-6MZR-R: This is a tongue of land following the Freston Brook. An ideal extension to the Orwell AONB.</p> <p>ANON-TK46-6MBV-4: a logical boundary.</p>	<p><u>Commentary</u></p> <p>The general support of the statutory consultees who responded to the statutory consultation is welcomed. No comments were made on the proposed boundary of the Freston Extension by either Suffolk or Essex County Councils. Ipswich Borough Council and Babergh and Mid-Suffolk District Council both indicated their general support for the proposed extensions but requested the inclusion of additional land. The evidence supplied in support of these requests is considered further below.</p> <p>The support of the SC&H and Dedham Vale AONB Partnerships for the proposed extensions including that at Freston is also welcomed. They did not make any comments in relation to the boundary of this proposed extension.</p> <p>Several respondents made generic comments in support of the boundary line chosen, which are welcomed.</p> <p><u>Conclusion</u></p> <p>The consultation demonstrated that there is a significant level of support overall for the proposed boundary of the Freston Brook extension.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>ANON-TK46-6M9T-S: The boundary includes all tyhe (sic) key areas of this landscape</p> <p>ANON-TK46-6MB9-7: CLEAR LOGICAL AREA</p> <p>ANON-TK46-6MMH-1: The boundary is consistent with the landscape character of this area.</p> <p>ANON-TK46-6MMU-E: Adequate without being too extensive</p> <p>BHLF-TK46-6MBK-S: I approve of all three extensions to the A.O.N.B</p> <p>Other BHLF-TK46-6MDN-X: Ipswich Borough Council: None of the three candidate areas is adjacent to the Ipswich Borough boundary. The closest is the Freston Brook valley, which is a small addition proposed to the existing AONB on the south bank of the Orwell estuary. Therefore, none of the changes would have a direct impact on the Borough.</p>	
<p>Include more land to the south-west, including Alton Water</p>	<p><u>Proposed Boundary Amendments</u></p> <p>Include additional areas BHLF-TK46-6MDN-X: Ipswich Borough Council: The study area did include all of the Shotley Peninsula and the background material supplied to the Council by Natural England includes the evaluation notes for areas included and excluded. Although we appreciate the criteria which Natural England have applied in evaluating areas, it does seem a potential missed opportunity to have excluded Alton Water, as it is a significant recreational resource for Ipswich residents. The Council broadly supports proposals to extend the AONB into the candidate areas and thereby to support the conservation of the area's natural beauty. However, the Council considers the exclusion of Alton Water to be regrettable, as it is a countryside recreational resource enjoyed by Ipswich residents. Designation could: a) make it more likely that the area available for people to enjoy would increase towards the 500ha target identified through the Haven Gateway Green Infrastructure Strategy for a regional scale accessible natural greenspace, and b) make the mitigation of man-made features that seem to have prevented the designation more likely, e.g. by screening or other improvement. The reservoir also plays a role in providing an alternative recreational destination to the Orwell Estuary Special Protection Area (SPA). The Council is currently working with partners (including Natural England) to prepare a Recreational Disturbance Avoidance and Mitigation Strategy ('RAMS') to ensure that measures are implemented to mitigate the potential cumulative effect of housing growth across</p>	<p>Commentary</p> <p>Two potential additions to the Freston Brook Extension towards the south-west were suggested: A) Include more land to the south-west including Alton Water. B) Include land adjacent to Holbrook and Cutlers Wood These are considered below:</p> <p>A) Include more land to the south-west including Alton Water In relation to the inclusion of Alton Water and its surroundings, BHLF-TK46-6MDN-X: Ipswich Borough Council and ANON-TK46-6M93-R: The land concerned has been reviewed in light of the consultation comments. Natural England agrees with the conclusion of the consultants commissioned by the AONB Partnership (LDA Design) that, there is currently limited potential for the inclusion of Alton Water and Holbrook Valley within the AONB. It also agrees with them that this area has significant potential for landscape enhancement.</p> <p>When considering whether an area has sufficient natural beauty to warrant designation as AONB, Natural England is however constrained by the wording of the Countryside and Rights of Way Act 2000. As set out in the Guidance, it has been established during previous public inquiries in</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>Ipswich Borough, in combination with that in Suffolk Coastal District. Therefore, it is important to ensure that the landscape attractiveness of Alton Water and its surrounding areas is maximised. The Suffolk Coast and Heaths AONB Partnership commissioned work by LDA Design to review the proposed boundary revisions (Suffolk Coast and Heaths AONB Boundary Variation, LDA Design 15 March 2018). This concludes that, although there is currently limited potential for the inclusion of Alton Water and Holbrook Valley within the AONB, this area has significant potential for landscape enhancement, in particular as a setting for recreational activity at, and in the vicinity of, the reservoir.</p> <p>BHLF-TK46-6MM99-X: Babergh & Mid Suffolk District Councils: Freston Brook - The extension includes Holbrook Park, Carters Wood and Freston Lodge Farm but does not include any surrounding landscape; In particular there is an area south of Holbrook Park which includes a bridleway that leads down to a lane. The lane rests within a valley setting and would appear to be an important part of the context of the area in which the woods sit and would therefore meet the principles set out in para.6.1 as having sufficient natural beauty.</p> <p>ANON-TK46-6M93-R: Seems appropriate, however might it be helpful to extend around Alton Water or is this man made beauty?</p>	<p>relation to the designation of protected landscapes that the use of the present tense in the wording of the relevant legislation means that the assessment for outstanding natural beauty can only take into account the degree of natural beauty at the time of the assessment. It cannot take account of opportunities to enhance natural beauty unless these are at a stage of development that means that they will definitely happen.</p> <p>The technical assessment found that the Holbrook Valley and Alton Water area as a whole had a mixed weight of evidence of natural beauty and was not considered suitable for national level designation and in reviewing this area the same conclusion was reached. As stated in the technical assessment, it is largely a young, modern-looking landscape of mixed landscape and scenic quality. There is a small area of higher quality in the vicinity of Tattlingstone Place, where historic buildings, parkland, woodland and pasture combine to pleasing effect with gently sloping valley topography and small tributary valley slopes on both sides of the reservoir. However this area is relatively small and has lost much of its historic parkland landscape setting owing to the construction of the reservoir.</p> <p>The wider Alton Water area as a whole has a lower weight of evidence of natural beauty owing to the simple flat topography, the limited views of the narrow stretch of water, the thick young planting around its shoreline, the influence of utilitarian concrete structures associated with the reservoir and the area's active recreational use/management. Additional information can be found in the evaluation table for the Alton Water Character Area in the technical assessment. Although the Alton Water area is a very pleasant area with a rural nature and some special qualities and features of interest, Natural England does not consider that it meets the natural beauty criterion. The assessment and subsequent review also noted that the surrounding typical flat plateau landscape did not meet the criterion of outstanding natural beauty.</p> <p>The high level of recreation use of the area was also noted. It is clearly a locally valued recreational resource. The opportunities for open air recreation available in this area are not however a relevant consideration when assessing the natural beauty of areas for designation as AONB (though they are for national parks). Since the area is considered to be such a valuable recreation area for the residents of Ipswich and for the protection of the Orwell estuary SPA, the undertaking of the potential improvements to the area mentioned in the Council's response should not be precluded by its omission from the proposed extension of the AONB.</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
		<p>Natural England considers that this area does not meet the natural beauty criterion and that the management of the recreational use of the area is best achieved through existing management mechanisms.</p> <p>B) Include land adjacent to Holbrook and Cutlers Wood BHLF-TK46-6MM99-X Babergh & Mid Suffolk District Councils: In relation to the proposed inclusion of the area surrounding Holbrook Park to the south-west, the technical assessment noted that the surrounding area is largely typical plateau landscape. The tributary valley mentioned by Babergh in its response is visible from the valley slopes adjacent to Tattlingstone village and looking across the reservoir from the west this valley, rising up towards the heavily wooded skyline of Holbrook Park adds visual interest in this area, particularly the attractive lower slopes adjacent to the reservoir, as noted in the assessment. However this also noted the effect of the arable cultivation of the upper valley slopes and the wider surrounding typical plateau landscape on the level of natural beauty of the upper part of this small area. The area south-west of the woods was not considered to sufficiently meet the natural beauty criterion to warrant inclusion in the proposed extension. Holbrook Park and Cutlers Wood themselves were included within the proposed extension owing to the contribution they make to the setting of the Freston valley landscape which runs eastwards from the woods towards the Orwell Estuary and not as part of the wider landscape to the west. The woods form the skyline to the qualifying Freston valley system.</p> <p>Conclusion No change to the boundary.</p>
<p>Include / exclude more or less land along Freston Brook</p>	<p>Proposed Boundary Amendments</p> <p>Include additional areas ANON-TK46-6MB6-4: There are other significant archaeological features nearby such as the Freston Enclosure. This is a scheduled ancient monument. I think the boundary of the AONB should be extended to include the Freston Enclosure and associated field and ditch systems which are very close to the boundary you are proposing, but just outside.</p> <p>ANON-TK46-6MBW-5: Could be bigger</p> <p>Remove areas from the proposed extension BHLF-TK46-6MMX-H: Suffolk Preservation Society: We welcome the inclusion of the valley area in the AONB but question whether the Holbrook Park or Cutlers</p>	<p>Commentary Two other potential additions to the Freston Brook Extension were suggested: A) Include nearby cultural heritage features B) Remove Holbrook Park and Cutlers Wood and intervening farmland</p> <p>A) Include nearby cultural heritage features ANON-TK46-6MB6-4: The only scheduled monument in the vicinity of the proposed extension is the Interrupted ditch system, north of Potash Farm. This feature lies in an area of typical plateau farmland over a kilometre further south than the proposed extension, in an area where the landscape has been much altered to accommodate the needs of modern arable farming. This area was assessed and was not considered to meet the</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
	<p>woodland should be included. It is not clear that these areas of woodland reflect the special qualities and characteristics of the rest of the AONB. Furthermore their inclusion requires the strip of plateau farmland to the south of Valley Farm being included in the designation which may not adequately meet the criteria.</p>	<p>natural beauty criterion. It is also too far away from the proposed extension for its inclusion to be considered as a feature on the edge of the qualifying area.</p> <p>B) Remove Holbrook Park and Cutlers Wood and intervening farmland BHLF-TK46-6MMX-H: Suffolk Preservation Society: the inclusion of this area was reviewed in light of the consultation response requesting its removal. The reasons for the inclusion of Holbrook Park and Cutlers Wood and the area between them have been outlined in the section above. The field between them next to Valley Farm mentioned by the respondent contains the head of the Freston Valley system. This valley system as a whole meets the natural beauty criterion and currently lies partly within the existing AONB and partly adjacent. Although the woods are just outside the valley system they lie within the zone of influence of the valley, forming the skyline around the valley area and make a positive contribution to the natural beauty of the area. They are woodlands of special landscape and conservation interest in their own right, containing high levels of natural heritage, with extensive areas of spring flowers and rare ancient pollards and a range of cultural heritage features which also give them significant levels of visual interest. As features of interest on the edge of the proposed AONB variation, their inclusion is also consistent with the boundary setting considerations in the Guidance which state that: "Areas and features of wildlife, geological, geomorphological, historic, cultural or architectural value which are situated on the margins of an AONB should be included where practicable providing they are situated within a tract that meets the statutory criterion." Both are part of a woodland SSSI which lies currently partly within the existing AONB and partly outside. In addition Holbrook Park is a very rare survival of a mediaeval deer park which features in the writings of Rackham. Internal ditches and banks relating to its past management are still clearly visible adding cultural heritage interest to the area. The inclusion of these woods is also consistent with the approach taken in other nearby designated landscapes where similar situations arose, eg the inclusion of Arger Fen and Tiger Hill in an extension to the Dedham Vale AONB.</p> <p>In relation to the comment that the inclusion of the woods required the strip of farmland between the woodlands to be included which may not adequately meet the criteria, it is accepted that this strip of land is largely of a plateau character, but the part of this area adjacent to Valley Farm contains the head of the valley and the woods frame the skyline of the valley system. The Natural England Guidance makes it clear that visual</p>

<u>Theme</u>	<u>Representations</u>	<u>Recommended Natural England Commentary</u>
		<p>associations are an important boundary consideration and this area has a clear visual association with the valley system. Natural England considers that the inclusion of this area is warranted notwithstanding its largely plateau character and that the boundary should not be amended.</p> <p><u>Conclusion</u> No change to the boundary</p>

Conclusion in relation to the boundaries.

A range of suggestions were made to amend the proposed boundaries to include additional areas or remove others from the proposed extensions. All the proposed changes to the boundary suggested during the statutory and formal consultation were considered in terms of the quality of evidence supplied and were checked in the field.

A number of suggestions were made to include areas which had originally been assessed as not meeting the natural beauty criterion. These areas were re-evaluated in light of the evidence supplied and as described in the analysis of natural beauty representations above, the findings of the original assessment of natural beauty in these areas were found to be sound. Subsequently, the proposed boundaries in these areas were also re-evaluated and found to be appropriate and sufficiently robust.

Natural England has concluded that none of the proposed amendments to the proposed boundary are required and no amendments to the proposed boundaries of the three proposed extensions are suggested. Due consideration has been given to all responses, but the evidence supplied in support of the proposed changes was not found to be sufficient to warrant the changes suggested and Natural England remains of the view that the proposed boundary is appropriate and sufficiently robust. No boundary amendments have been made as a result of the formal consultation process.

5.0 Overall Conclusion

5.1 Summary of Results Analysis

- 5.1.1** Natural England has considered all of the consultation responses and analysed both quantitative and qualitative data in detail.
- 5.1.2** A range of responses were received both in favour of and objecting to the proposed extensions and suggesting a range of additions to, or deletions from, the proposed extensions.
- 5.1.3** There was a significant majority of respondents in favour of designating the proposed extensions. There were some dissenting voices, though objections were in single figures for all three proposed extension areas, ranging from 6 for the Stour Estuary to 2 for the Freston Brook Extensions. Objections were largely from landowners and farmers and their agents and one of their representative bodies as well as from one house developer.
- 5.1.2** Many respondents supplied additional evidence in support of their views, some very detailed and Natural England has considered whether this evidence necessitated changes to any of the proposals. Overall, little of the evidence supplied was new and substantial, much of it had previously been raised during and considered after, the informal consultation process and the assessments duly took account of this at that time.

5.2 Satisfying the legislative test

- 5.2.1** Natural England remains of the view that there is a clear weight of evidence that the areas within the three proposed extensions meet the criterion of outstanding natural beauty required for AONB designation. Taken together with the existing Suffolk Coast and Heaths AONB they form 'an area of land' of outstanding natural beauty as required by the legislation. Natural England considers that the designation of these qualifying areas, which are contiguous with the existing AONB, is desirable and that the boundaries of each proposed extension are sufficiently robust and appropriate.