

APPENDIX D

Proposed consultation to Natural England's Proposed extension to the Suffolk Coast and Heaths AONB Boundary 2018.

The Council welcomes the proposal to extend the boundary of the AONB southwards towards Essex and the inclusion of areas with Babergh.

With respect to the revised extension to the AONB within the Babergh District the Council wishes to make the following comments:

- East of Brantham built up area. With regards to factors related to Natural beauty, it is unclear on the justification for the revised boundary to abut existing development and to continue south to include the decoy pond area near Factory Lane.

The Council objects to the proposed extension of the AONB in this location as it is not considered to be clearly justified (in accordance with the criteria guidance for assessing landscapes for designation) nor is it evident whether the policy and landscape implications of the Brantham regeneration area have been fully considered. The land in question includes part of the Brantham Strategic Policy Area as designated in the Babergh Core Strategy (Policy CS10). The area proposed includes part of the land covered by Planning Application B/15/00263 which is for the employment led regeneration of the area. The land also includes an existing Sewage Treatment Works. At the time of consideration of the application responses received from the Dedham Vale AONB & Stour Valley Project (dated 1 May 2015) and Natural England (dated 1 May 2015 and 7 March 2016) did not raise potential issues or implications relevant to this in the context of the application. There is now a resolution to grant permission for the application. Clarification on the assessment of the inclusion of this area in the proposed extension (taking account of the baseline environment) is required. Should Natural England seek to continue to include this area within the extension the Council seeks clarification from Natural England on the implications on the above stated issues.

Under the heading "Incongruous features" (pg 49), the evaluation mentions the Brantham regeneration Area and planning application but does not satisfactorily take into consideration the implications of the proposed boundary extension on the development site or vice versa.

The 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".

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." This seems in direct conflict with the evaluation.

An additional area has been introduced to the proposed extension since the boundary review in 2016. The Pattles Fen, Brantham, managed by the Woodland Trust provides a narrow corridor of wildlife and interest north of a residential estate and south to the A137. Comments are made regarding the loss of traditional small to medium fields and hedgerows but the proposals still consider this area suitable for inclusion which conflicts with the similar comments justifying the exclusion of the area S1 Harkstead – therefore there is a lack of consistency in the evaluation.

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- 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 is however a significant area of plateau farmland south of Manningtree which has been excluded. As required in the guidance notes para.6.1 judgements need to be made to whether people are likely to perceive a landscape as having natural beauty. For this part of the extension this judgement does not appear to be consistent or transparent as required.

Furthermore 3.4.1 States that If a landscape, or an element within it, is rare or representative of a particular type of landscape, it may add weight to the judgment that an area should be represented within an AONB (although the Natural England Guidance clarifies that this is not an essential requirement)

- The extension includes Holbrook Park, Carters Wood and Freston Lodge arm 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.
- 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.
 - The additional extension proposed to the west of Dodnash so aligning the boundary with that of the Dedham Vale AONB.
 - The proposed additional extension at Stutton to align with Bentley Lane.