

## THE STOUR AND ORWELL SOCIETY

### BABERGH & MID SUFFOLK JOINT LOCAL PLAN

#### CONSULTATION ON PREFERRED OPTIONS

##### INTRODUCTION

We write almost entirely regarding the Stour and Orwell AONB, although we wish to support the specific comments made by the Dedham Vale Society in so far as they relate to AONBs in general and specifically in relation to the Dedham Vale AONB, which adjoins and relates closely to protected landscapes of the Stour and Orwell estuaries.

The Stour and Orwell part of the Suffolk Coast & Heaths AONB and the adjacent Additional Project Area is a very small area within the context of Babergh and Mid Suffolk. It is a sensitive, indeed a fragile piece of landscape, served mainly by one “B” class road running through the spine of the peninsula to Shotley. Its tranquillity and rural character are **absolutely integral** to its importance - both for those who live and work here, but also for the many for visitors enjoy it. Your Plan calls for several hundreds of houses to be built in this area over the next 15 years or so, and, while the Society is not about preservation in aspic, we are very aware of the fragility of this nationally important asset and are deeply concerned that this is not fully appreciated by Babergh DC.

##### OVERALL HOUSING PROVISION

Generally, given sensitivity of the environmental assets of which the Councils are custodian, we are very surprised indeed to see a plan which proposes 5,307 additional houses for Babergh within the plan period (SP04), when the actual residual requirement is stated to be 3,524. This **over-provision of just over 50%** (in relation to the residual requirement) is simply not explained. It seems to the Society that a more appropriate level of provision would allow allocations which threaten the more environmentally sensitive parts of the district to be removed.

## **COMMENTS ON SPECIFIC PARAGRAPHS**

1. Re **paragraph 10.08**. We support this background paragraph and particularly wish to emphasise that Tourism must be 'sustainable'. Large hotels and other large tourist developments and tourist coaches for example would be wholly inappropriate and out of character in the Shotley peninsula.
2. Re **LP19** on page 89 of the printed version and page 107 of the online version (we have checked some of the text of each and assume that the difference in pagination is due to the differences in layout only).

In Chapter 3, Vision and Objectives, the draft Plan recognises the significance of the AONB as a key environmental issue. As stated in the NPPF (paragraph 172), "*Great weight should be given to conserving and enhancing landscape and scenic beauty in ... Areas of Outstanding Natural Beauty [AONB], which have the highest status of protection in relation to these issues.*" However, this national policy imperative is **not** reflected in the relevant section on Local Policies relating to the AONB (**Policy LP19**), for two reasons.

**Firstly**, the draft Plan does not provide any discussion at all under the heading Policy Background and Explanation. This is in contrast to, for example, the section on The Historic Environment (Policy LP20) which provides a lengthy and useful discussion and introduction which reflects the importance of the issue. As currently drafted, the Plan does **not** therefore appear to give sufficient weight to the AONB, particularly as this is a national designation enshrined in legislation.

We would like to see a statement in the Plan of **the national importance of the Stour and Orwell AONB, and the priority given by the Council to conserving and enhancing its natural beauty.**

We would also like to see some words along the following lines by way of preamble to the Policy:

*"While conservation and enhancement is essential it is recognised that the AONB is a 'living' landscape which needs to be able to adapt, change and respond positively to changing social, economic and environmental issues (climate change, changing agricultural sector, recreational pressures) to meet the needs of the local community and visitors to the area. In exceptional cases development proposals that help maintain the economic and social wellbeing of the AONB will be supported where these do not detract from the natural beauty and special qualities of the AONB or its*

*setting. Minor house extensions may have little impact on the landscape qualities of the AONB and accordingly will not be exclusively rejected on this basis where they otherwise acceptable.*

*“The Suffolk Coast and Heaths Management Plan 2018 is a material consideration and sets out the management objectives for the AONB and the Additional Project Area. The Management Plan has a key role in supporting and coordinating the role of management of the AONB as required by the Countryside and Rights of Way Act 2000. A key objective of the Management Plan is to conserve and enhance the AONB’s natural beauty and improve its special qualities. Working with local communities, farmers, businesses, non-government organisations, local authorities, statutory agencies and individuals the AONB Management Plan reflects the co-ordinated activity of the partnership.*

*“Any large scale development proposals will have to be supported by a Landscape, Visual and Environmental Assessment. Where exceptional development is suitable, landscape enhancements, mitigation or compensation measures must be provided.*

*“Proposals for solar farm developments or wind turbine/wind farms within or on land within the setting of the AONB should have regard to the advice in the Department for Communities and Local Government’s document entitled “Planning practice guidance for renewable and low carbon energy” (July 2013).*

*“The Local Planning Authority will also encourage proposals in or near the AONB to underground new infrastructure associated with electricity schemes or communication equipment where financially viable, to help protect its landscape qualities.*

*“Proposals outside the AONB will not be supported where they will have a negative impact on the natural beauty, tranquillity, special qualities, setting and public enjoyment of the AONB.”*

**Secondly**, the Policy itself is poorly worded. Although it defines criteria which, if met, would allow the Council to support development, it does not make it clear that developments that do not meet these criteria will not be supported.

We suggest that the policy should be revised and expanded to read as follows:

*“Development will only be supported in or on land within the AONB where it:*

- *makes a positive contribution to conserving and enhancing the natural beauty and special qualities of the AONB, including tranquillity and the AONB’s good quality night/dark skies;*
- *does not adversely affect the character or quality of views within, into and out of the AONB or the distinctiveness of the AONB or threaten public enjoyment of the AONB, including by increased motorised vehicle movement.*
- *will not result in any adverse impacts on the setting of the AONB which cannot reasonably be mitigated against; and*
- *supports the wider environmental, social and economic objectives as set out in the Suffolk AONB Management Plan.*

*“Applications for major development within or in close proximity to the boundary of the AONB will be refused unless in exceptional circumstances it can be demonstrated that the development is in the public interest and this outweighs other material considerations.”*

3. Re **LP25**. Paragraph 15.60 re renewable energy states that there should be “no adverse effects” on the AONB. This is inconsistent with the actual policy (para 3) which merely requires that “potential harm resultant from development can be effectively mitigated” i.e. decreased. We would like to see the policy amended by the addition of the words after ‘mitigated’ “so that there are no adverse effects on the AONB ” to make the policy absolutely clear.
4. Re **LA016** Land west of Bourne Hill, Wherstead. This land adjoins a boundary of the AONB and we are very concerned at the effect that such a major housing development (75 houses) will have both on the AONB itself and particularly the road infrastructure at the bottom of Bourne Hill and its roundabout junction. There are already quite severe tailbacks at peak periods and this housing will exacerbate them.
5. We note that while the allocation states that the development should be ‘sympathetic’ to the AONB (paragraph II) there is no mention of the impact on the AONB in paragraph IV. At the very least we would like to see the AONB inserted so it is alongside the SPA and Ramsar Habitat Sites.

6. Re **LA101** – Allocation: Land north of The Street, Wherstead. The wording of paragraph II is ambiguous and needs editing to make it clear that the site is actually within the AONB. This is a significant area of land and any substantial number of houses is subject to the same objections as **LA016** above. SOS does not support this proposal.
  
7. Re **LA053** – We note in paragraph II that the allocation refers to the ‘Dedham and Vale AONB (sic) but the proposed extension to the boundary of the Stour and Orwell AONB will bring it even closer to the site than the Dedham Vale AONB and we ask that the wording be modified accordingly to include ‘the proposed new boundary of the Stour and Orwell AONB’.