

## **Position Statement – Suffolk & Essex Coast & Heaths National Landscape Partnership (January 2024).**

### **Development in the setting of the Suffolk Coast & Heaths AONB.**

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#### **Introduction**

There are 34 Areas of Outstanding Natural Beauty (AONB) in England. Designated by Government, they are considered some of the finest landscapes in the country and there is a statutory purpose to conserve and enhance their natural beauty.

#### **Purpose**

This Position Statement provides guidance to local planning authorities, developers/scheme proposers, landowners and other interested parties about the need to consider how development and land management proposals in the setting of the Suffolk Coast & Heaths AONB can impact on its natural beauty of the AONB. Development includes all proposals requiring planning permission, as well as transport and other infrastructure projects. Land management includes tree planting, energy crops, and drainage schemes.

The National Landscape Partnership, a grouping of around 20 organisations which act as a champion for the AONB, considers the setting to the AONB to be the area within which development and land management proposals, by virtue of their nature, design, scale, siting, materials and colour have the potential to result in substantial impacts, positive or negative, on the natural beauty and special qualities of the AONB.

#### **Policy Context**

The need to consider the impact of proposals within the setting of an AONB is enshrined in the National Planning Policy Framework, Planning Practice Guidance, National Policy Statements, the Countryside and Rights of Way Act 2000 and in adopted Local Plans covering the Suffolk Coast & Heaths AONB. This is discussed more fully in Appendices 1 & 2.

This Position Statement expands upon issues raised in the statutory Suffolk Coast & Heaths AONB Management Plan which is reviewed every five years.

The Management Plan recognises that AONBs sit within a wider countryside setting, which not only enhances the value of these landscapes and the experience of being in them, but also delivers wildlife and access benefits.

The Position Statement is intended to be used to support the inclusion of management plan policies and objectives covering development and land management in the setting to Suffolk Coast & Heaths AONB in Local Plans and other relevant policy documents.

It is intended to aid decision-making for development or land management proposals within the setting to the AONB as it clarifies the Suffolk & Essex Coast & Heaths National Landscape Partnership's understanding of setting.

The National Landscape team and Suffolk & Essex Coast & Heaths National Landscape Partnership will seek to ensure that Local Plan policies and other relevant documents highlight

the need to consider the impact of development and land management proposals on natural beauty, within the setting to the Suffolk Coast & Heaths AONB.

The Suffolk & Essex Coast & Heaths National Landscape Partnership anticipates that local authorities, decision makers, and proposers, will consider fully the potential impacts on natural beauty, positive and negative, that could arise from a development within the setting of the AONB. It is anticipated that the views of the Partnership will be sought when significant impacts are anticipated. Examples of adverse impacts are set out in Appendix 3.

The National Landscape Planning Officer will seek to monitor and comment on planning applications within the setting of the Suffolk Coast & Heaths AONB which have the potential to significantly impact the natural beauty and special qualities of the National Landscape.

The National Landscape Planning Officer will report significant applications to the AONB's Joint Advisory Committee or Partnership as appropriate.

### **Notes**

In accordance with Section 85 of the Countryside and Rights of Way Act 2000, relevant authorities including planning authorities, statutory bodies and statutory undertakers have a duty to seek to further the statutory purpose of designation i.e. to conserve and enhance the natural beauty of the AONB.

The Suffolk Coast & Heaths AONB was first designated in 1970 and the boundary was extended again in 2020. It is one of 34 Areas of Outstanding Natural Beauty in England and covers approximately 440 sq km.

While the term Area of Outstanding Natural Beauty is the legal term for the area, in common usage the area is referred to as the Suffolk & Essex Coast & Heaths National Landscape.

The legally defined Suffolk Coast & Heaths AONB includes parts of Essex.

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## **Appendix 1. National legislation and guidance covering development proposals within the setting of the Suffolk Coast & Heaths Vale AONB.**

### **National Planning Policy Framework**

Paragraph 182 of the National Planning Policy Framework requires great weight to be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues.

In addition to limiting the scale and extent of development within these designated areas it also now states that

*'.....development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.'*

### **Planning Practice Guidance**

The Planning Practice Guidance provides more detail about development within an AONB setting. It confirms that the statutory duty applies to proposals located outside of AONB boundaries, as they might have an impact on their setting or protection.

The Planning Practice Guidance goes on to state that:

*'Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account.'*

## **National Policy Statements for Energy - Developments outside nationally designated areas**

### **National Policy Statement for Energy (EN-1)**

Paragraph 5.10.8 of EN1 states *'The duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. The aim should be to avoid harming the purposes of designation or to minimise adverse impacts on designated areas, and such projects should be designed sensitively given the various siting, operational, and other relevant constraints.'*

### **National Policy Statement for Electricity Networks Infrastructure (EN5)**

In paragraph 2.11.4 of EN5 there is a strong presumption in favour of undergrounding new overhead transmission lines, within nationally designated landscapes i.e. National Park, Broads, or Areas of Outstanding Natural Beauty.

Paragraph 2.11.5 of EN5 states *'Away from these protected landscapes, and where there is a high potential for widespread and significant landscape and visual impacts, the Secretary of State should also consider whether undergrounding may be appropriate, now on a case by-case basis, weighing the considerations outlined above.'*

### **Nationally Significant Infrastructure Projects**

All Nationally Significant Infrastructure Schemes with the potential to impact on the setting of Protected Landscapes should accord with the requirements of Countryside and Rights of Way Act 2000.

Section 85 of the Countryside and Rights of Way Act 2000 places a statutory duty on all relevant authorities requiring them to further the statutory purpose of AONBs when coming to decisions or carrying out their activities relating to or affecting land within these areas.

Guidance on this new strengthened duty is being prepared.

In 2010 Natural England also published “Making Space for Renewable Energy” – Natural England’s approach to assessing on-shore wind energy development”. This includes the statement:

*‘Natural England regards the setting of protected landscapes as being potentially influential on the conservation of the special qualities of the National Park or AONB concerned.’*

This guidance continues ‘Spatial plans should include policies that take into account the sensitivity of the setting of protected landscapes.’ *‘The potential for developments to dominate the setting of protected landscapes requires careful consideration.’*

Some offshore Nationally Significant Infrastructure Projects fall with the setting to the Suffolk Coast & Heaths AONB and have the potential to impact on its natural beauty Where this is the case, reference should be made to the Seascape Assessment for South Suffolk, Norfolk and North Essex<sup>1</sup>

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<sup>1</sup> [Seascape Typology - Suffolk Landscapes](#)

## **Appendix 2 Local Plan Policies**

The Suffolk Coast & Heaths AONB extends across six planning authority areas including Essex and Suffolk County Councils, Babergh Mid-Suffolk District Council, Ipswich Borough Council, Tendring District Council and East Suffolk Councils (Suffolk Coastal and Waveney). These councils recognise the AONB in their Local Plans in adopted and emerging planning policy.

### **Joint Babergh Mid Suffolk Local Plan Part 1 (adopted November 2023)**

#### **Policy LP18 –Area of Outstanding Natural Beauty**

1. Proposals for major development<sup>28</sup> within the AONBs will be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.
2. The Councils will support non-major development within the AONBs and development within the setting of the AONBs that:
  - a. Gives great weight to conserving and enhancing the landscape and scenic beauty;
  - b. Integrates positively with the character of the area and reinforces local distinctiveness of the AONBs;
  - c. Is sensitive to the natural and built landscape and visual impacts (including on dark skies and tranquil areas);
  - d. Supports the provision and maintenance of local services, facilities and assets (including affordable housing), so long as it is commensurate with the character and objectives of the AONBs;
  - e. Demonstrates special regard to conserving and enhancing landscape character, landscape values and heritage assets in the AONBs; and
  - f. Conserves the distinctiveness of the AONBs (including quality views), supports the public enjoyment of these areas and the wider social and economic objectives set out in the AONB Management Plans.

### **Ipswich Borough Council Local Plan - Core Strategy And Policies Development Plan Document Review (adopted March 2022)**

#### **Policy DM11 – Countryside**

Within the countryside defined on the Policies Map, development will only be permitted if it:

- a) respects the character of the countryside; and
- b) maintains separation between Ipswich and surrounding settlements; and
- c) does not result in isolated dwellings; and
- d) contributes to the green trail and other strategic walking and cycling routes and wildlife corridors where appropriate.

Major development in the countryside will only be permitted if it satisfies a. to d. above and:

- i) is necessary to support a sustainable rural business including tourism; or
- ii) is a recreational use of land which retains its open character; or
- iii) is major residential development.

In the case of the AONB, major development, as defined by NPPF footnote 60, will only be permitted in exceptional circumstances in accordance with NPPF paragraph 177. The natural beauty, landscape and special qualities of the AONB and the contribution that land within its setting makes to this should be conserved and enhanced.

## **Tendring District Local Plan 2013-2033 and Beyond Section 2 (adopted January 2022)**

### **Policy PPL 3 The Rural Landscape**

The Council will protect the rural landscape and refuse planning permission for any proposed development which would cause overriding harm to its character or appearance, including to:

- a. estuaries, rivers and undeveloped coast;
- b. skylines and prominent views including ridge-tops and plateau edges;
- c. traditional buildings and settlement settings;
- d. native hedgerows, trees and woodlands;
- e. protected lanes, other rural lanes, bridleways and footpaths; and
- f. designated and non-designated heritage assets and historic landscapes including registered parks and gardens.

Development proposals affecting protected landscapes must pay particular regard to the conservation and enhancement of the special character and appearance of the Suffolk Coast & Heaths Vale and Suffolk Coast and Heaths AONBs, and their settings, including any relevant AONB Management Plan objectives.

Elsewhere, development proposals should have regard to the Natural England Character Area profiles for the Greater Thames Estuary (No.81) and the Northern Thames Basin (No.111) and the Council's Landscape Character Assessments, as relevant, and should protect and reinforce identified positive landscape qualities.

New development within the rural landscape should minimise the impact of light pollution on the site and its surroundings, in order to protect rural amenity and biodiversity. This Policy contributes towards achieving Objectives 7 and 8 of this Local Plan.

## **Suffolk Coastal Local Plan Adopted September 2020**

### **Policy SCLP10.4: Landscape Character**

Proposals for development should be informed by, and sympathetic to, the special qualities and features as described in the Suffolk Coastal Landscape Character Assessment (2018), the Settlement Sensitivity Assessment (2018), or successor and updated landscape evidence.

Development proposals will be expected to demonstrate their location, scale, form, design and materials will protect and enhance:

- a) The special qualities and features of the area;
- b) The visual relationship and environment around settlements and their landscape settings;
- c) Distinctive landscape elements including but not limited to watercourses, commons, woodland trees, hedgerows and field boundaries, and their function as ecological corridors;
- d) Visually sensitive skylines, seascapes, river valleys and significant views towards key landscape and cultural features; and
- e) The growing network of green infrastructure supporting health, wellbeing and social interaction.

Development will not be permitted where it will have a significant adverse impact on rural river valleys, historic park and gardens, coastal, estuary, heathland and other very sensitive landscapes.

Proposals for development will be required to secure the preservation and appropriate restoration or enhancement of natural, historic or man-made features across the plan area as identified in the Landscape Character Assessment, Settlement Sensitivity Assessment and successor landscape evidence.

Development will not be permitted where it would have a significant adverse impact on the natural beauty and special qualities of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty, that cannot be adequately mitigated. Development within the Area of Outstanding Natural Beauty, or within its setting, will be informed by landscape and visual impact assessment to assess and identify potential impacts and to identify suitable measures to avoid or mitigate these impacts. Planning permission for major development

in the Area of Outstanding Natural Beauty will be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest, subject to the considerations set out in the National Planning Policy Framework.

Proposals should include measures that enable a scheme to be well integrated into the landscape and enhance connectivity to the surrounding green infrastructure and Public Rights of Way network.

Development proposals which have the potential to impact upon the Area of Outstanding Natural Beauty or other sensitive landscapes should be informed by landscape appraisal, landscape and visual impact assessment and landscape mitigation.

Proposals for development should protect and enhance the tranquillity and dark skies across the plan area. Exterior lighting in development should be appropriate and sensitive to protecting the intrinsic darkness of rural and tranquil estuary, heathland and river valley landscape character.

Neighbourhood Plans may include local policies related to protecting and enhancing landscape character and protecting and enhancing tranquillity and dark skies.

### **Waveney Local Plan Adopted March 2019**

#### **Policy WLP8.35 – Landscape Character**

Proposals for development should be informed by, and be sympathetic to, the distinctive character areas, strategic objectives and considerations identified in the Waveney District Landscape Character Assessment (2008), the Settlement Fringe Landscape Sensitivity Study (2016), the Broads Landscape Character Assessment (2016), the Broads Landscape Sensitivity Study for Renewables and Infrastructure (2012) and the most current Suffolk Coast and Heaths Area of Outstanding Natural Beauty Management Plan.

Development proposals will be expected to demonstrate their location, scale, form, design and materials will protect and where possible enhance:

- The special qualities and local distinctiveness of the area;
- The visual and historical relationship between settlements and their landscape settings;
- The pattern of distinctive landscape elements such as watercourses, commons, woodland trees (especially hedgerow trees) and field boundaries, and their function as ecological corridors;
- Visually sensitive skylines, seascapes and significant views towards key landscapes and cultural features;
- The distinctive landscapes of the Suffolk Heritage Coast;
- The natural beauty and special qualities of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty; and
- The unique landscape and characteristics of the Broads.

Proposals should include measures that enable a scheme to be well integrated into the landscape and enhance connectivity to the surrounding green infrastructure and Public Rights of Way network.

Development will not be permitted where it will have a significant adverse impact on:

- The landscape and scenic beauty of the protected landscapes and the settings of the designated areas of the Broads or the Suffolk Coast and Heaths Area of Outstanding Natural Beauty; or
- Locally sensitive and valued landscapes including Rural River Valleys and Tributary Valley Farmland character areas.

Development within the settings of the Broads and Area of Outstanding Natural Beauty or within the Area of Outstanding Natural Beauty itself will be informed by a Landscape and Visual Impact Assessment to assess and identify potential impacts and to identify suitable measures to avoid or mitigate these impacts.

Proposals for development should protect and enhance the tranquillity and dark skies of both the Waveney District and Broads Authority areas.



### **Appendix 3 Examples of potential adverse impacts from development and land management proposals.**

The setting of the Suffolk Coast & Heaths AONB has no defined geographical borders. The location, design, scale, materials and colour of a proposed development or land management activity will determine how it impacts the natural beauty and special qualities of the AONB.

A very large development may have an impact even if a considerable distance from the AONB boundary. Adverse impacts might not be visual. The special qualities of the Suffolk Coast & Heaths AONB include tranquillity. A development which is noisy may well adversely impact tranquillity even if not visible from the AONB.

Potential adverse impacts could include:

- Blocking or the interference of views out of the AONB particularly from public viewpoints
- Blocking or the interference of views of the AONB from public viewpoints outside the AONB
- Loss of tranquillity through the introduction of lighting, noise, or traffic movement
- An abrupt change to landscape character
- Loss of biodiversity, particularly species of importance within the AONB
- Loss of features of historic interest, particularly if these are contiguous with features within the AONB
- Reduction in public access to or within the AONB
- Increase in air or water pollution

While some developments may have an adverse impact on the AONB, some development or changes to land use e.g. tree planting outside the AONB could enhance these areas, for example by screening unsightly existing structures.