

## Appendix JM3

### Commentary on Table 1 from CD C18B

| Date | Event or Publication  | JM Commentary   |
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| 1969 | Suffolk Coast & Heaths AONB designated.<br>Suffolk Coast & Heaths Landscape Character Assessment (LUC) This included the wider Shotley Peninsula as an area connected to the AONB. The Peninsula landscape was considered to be an area of sandling similar to many inland parts of the AONB.   | Designated area <b>excludes</b> the Appeal site area  |
| 1993 | The assessment made reference to the landscape between Bentley and the A12 stating it had 'retained comparatively modest field sizes and blocks of woodland which resulted in a well-structured landscape in this area.'  | The Appeal site area is <b>not</b> located between Bentley and the A12  |
| 1994 | Suffolk Coast & Heaths AONB Management Plan included a defined Additional Project Area (APA) which covered land between the Orwell & Stour Estuaries and extended west as far as the A12. The Management Plan identified an extension of the AONB into this area as a management priority. This was a similar approach to that adopted for Dedham Vale and the Stour Valley Project Area. | And subsequently an AONB extension was made following detailed evaluations which <b>excluded</b> the Appeal site area |



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| <b>1997</b> | <p>Publication of the Suffolk Coast and Heaths Landscape, Countryside Commission, 1997. This assessment celebrated the special qualities of the landscape, based on the earlier LUC assessment. This document included a map showing the AONB and APA, which was certainly a defined area by that time.</p>  | <p><b>It is not in dispute that the APA was defined / identified as an area for further study.</b></p> <p><b>It has subsequently however been demonstrated to be of varied value and certainly cannot be considered in the same way as a formal designation.</b></p> |
| <b>2006</b> | <p>Babergh Local Plan Alteration No 2 (2006), Chapter 6, Countryside and the Rural Economy. This identified a Special Landscape Area at Dodnash.</p> <p>Para 6.22 notes that the extent of the SLAs within the district tend to relate to river valleys and have been drawn to follow physical features on the ground e.g. roads, hedgerows etc.</p> | <p><b>The Appeal site area does not relate to a river valley.</b></p>  |
| <b>2008</b> | <p>Suffolk Coast &amp; Heaths Management Plan continued support for the APA.</p>   | <p><b>It is not in dispute that the APA was defined / identified as an area for further study. It has however subsequently been demonstrated to be of varied value and certainly cannot be considered in the same way as a formal designation.</b></p>               |



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| 2013 | <p>The Shotley Peninsula and Hinterland Landscape Character Assessment described the qualities in the Bentley area as part of the Shotley Peninsula Plateau landscape character area. This assessment noted 'On the western fringe of this landscape, at the boundary with the claylands, that there is a notable pattern of estate halls including Bentley Old Hall, Bentley Manor and Bentley Hall' and that 'a network of single tracked lanes, connect the various settlements and reinforce the perception of the area being a rural backwater. Some ancient routes remain as tracks and footpaths particularly in the west.'</p> | <p>The document is quoted selectively. It also describes the area as follows – which seems to be a fair description of a landscape that is recognised as containing elements of value alongside detracting elements which diminish them: "The landscape is unique within Suffolk for its blend of <b>modern rectilinear field systems</b>, ancient woodlands, and parklands"</p> |
| 2014 | <p>Babergh Core Strategy and Policies (2011-2031) included a statement that adopted and saved Local Plan Policy CR04 - Special Landscape Areas, remained extant.</p>   | <p>No longer extant and indeed the origins of the Dodnash SLA remain lost.</p>   |
| 2015 | <p>Joint Babergh and Mid Suffolk District Council Landscape Guidance Supplementary Planning Document. There is no mention of Special Landscape Areas in this document. Nevertheless, it does note that: "The valley surrounded by Dodnash woods and Martins Glen has considerable scenic value with its variations in landform which is complemented by a mosaic of pasture, heath and woodlands, resulting in a particularly rich landscape."</p>   | <p>The valley that sits between Dodnash Woods and Martins Glen is located to the southwest of Bentley village and thus this statement has no relevance to the Appeal other than to confirm again that some parts of the undesignated landscape outside of the National Landscape are of higher value than others. The document is silent in respect of the Appeal site area.</p> |



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| Sept<br>2017 | <p>Natural Beauty Assessment for Suffolk Coast and Heaths Boundary Variation Project, Natural England. This evaluation identified the area around Bentley and the woodlands to the north as expressing a higher level of natural beauty (pages 70 to 74). However, the area was not included in the Candidate Area for designation due to its limited extent and geographical separation from other qualifying areas.</p> | <p>This is a very selective reading of CD G8 pages 70 to 74. Specifically, the following passage is highly relevant to the Appeal: (with my emphasis)</p> <p><i>In the immediate vicinity of Bentley Hall and Bentley Park there is a small area of higher scenic quality where a shallow winding tributary valley occurs in combination with well managed areas of estate woodland, parkland type planting, and some designed elements in the landscape, providing a strong woodland influence and estate character with harmonious compositions and slight topographical variation and glimpsed views to the wider plateau landscape. Numbers of attractive vernacular buildings around Bentley Hall, its church, and the presence of old green lanes such as Old Hall Lane also make a significant contribution to scenic quality in this small area, though it is surrounded in all directions by lower quality typical plateau arable land. There is also an area of well managed parkland around Bentley Manor contributing to higher scenic quality locally.</i></p> |
| 2018         | <p>2018-2023 SC&amp;H AONB Management Plan (page 12) made reference to The Shotley Peninsula Additional Project Area confirming that the AONB Partnership consider it to be a valued landscape as defined in the NPPF and that The Shotley Peninsula Landscape Character Assessment identified the links to the current AONB and the importance of co-ordinated land management.</p>                                      | <p>The reference to the APA as a valued landscape in the management plan is not substantiated with any explanation of in what respects it is valued. It is a legacy construct whose purpose was to be a search area for possible additional areas worthy of designation. That search has been undertaken, and the National Landscape has been extended. The pockets of elevated value within the APA are now well understood. The Appeal site area adjoins one of these but is not itself a valued landscape</p>  |



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| 2019 | <p>Landscape Appraisal of Bentley Parish, undertaken as part of the evidence base for the Bentley Neighbourhood Plan. This identified a valued landscape in the north of the Parish utilising GLVIA 3rd edition Box 5.1 criteria due to its intact historic patterns of settlement, ancient woodland, remnant parkland and rural lanes. It states 'Although the topography over much of this landscape is relatively flat, scenic quality is derived from the balanced and cohesive composition of mature trees, wooded skylines, arable fields, historic vernacular buildings and lack of modern development. The footpath network and winding rural lanes, coupled with gentle folds in landform, afford a range of sequential views across a rural backwater which impart strong perceptions of time depth. The ancient woodlands and hedgerows are valued habitats for significant populations of endangered Stag beetle and Dormouse. Many of the buildings are listed and form important groups. These qualities elevate the area above normal countryside.'</p> | <p>The Box 5.1 exercise within the Neighbourhood Plan Landscape Appraisal is undertaken for the whole Parish. It broadly indicates more valued qualities in the north than the south. It <b>does not</b> "identify" a valued landscape to the north – it simply indicates that there is a weight of evidence.</p> <p>The 'weight of evidence' approach is cursory and conclusory: it does not clearly identify what is valued, where the value lies, or how the conclusion is derived. It <b>cannot be treated as a robust identification</b> of a valued landscape; rather, it leaves the matter as one of professional planning judgement—one for which there is also a weight of evidence to the contrary, namely a landscape of mixed quality and value with localised higher-quality pockets within a broader, more commonplace context."</p> <p>This weight of evidence to the contrary includes the fact that the area has of course been studied in more detail in other documents, including the Natural England document [CD- G8] (which Alison Farmer references and supported production of) – which clearly describe in more detail a mosaic of higher and lower quality areas (see entry above with G8 quoted and with my emphasis added)</p> |
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| <b>March<br/>2020</b> | <p>Valued Landscape Assessment – Suffolk Coast &amp; Heaths Additional Project Area, utilising GLVIA 3rd edition Box 5.1 criteria. Evaluation Area 1 Wooded Plateau was noted for the following special qualities:</p> <ul style="list-style-type: none"> <li>• Hall/church complexes along with ancient woodland and rural lanes reflect patterns of the medieval landscape.</li> <li>• Remnant areas of parkland and notable veteran trees throughout area impart an established character.</li> <li>• Sinuous lanes and patterns created by wavy edges to ancient woodland, rural winding lanes and old park boundaries and enclosure patterns.</li> <li>• Wooded skylines defined by ancient woodlands and highly valued for biodiversity.</li> <li>• Attractive open views across rural farmland to individual or clusters of vernacular buildings.</li> </ul> <p>Areas where these special qualities are particularly well expressed include around Bentley Hall and Church and confirms recognition as a valued landscape.</p> | <p>This Box 5.1 exercise was undertaken for the whole of the Wooded Plateau. The exercise <b>does not</b> confirm recognition as a valued landscape. The report identifies that certain special qualities of the Western Wooded Plateau are <b>particularly well expressed</b> around Bentley Hall and Church, and that the landscape is relatively intact there; it provides evidence that may be relevant to considering landscape value, but it does not formally designate or otherwise 'confirm recognition' of a discrete valued landscape area around Bentley Hall and Church.</p> |
| <b>July<br/>2020</b>  | <p>Boundary Extensions to the SC&amp;H AONB/National Landscape confirmed by Secretary of State.</p>   |   |
| <b>2023</b>           | <p>Suffolk Coast &amp; Heaths National Landscape Management Plan published. APA mapped on page 18 and discussed on page 19 stating 'these areas are valued landscape as defined by the NPPF and are an important part of the setting of the AONB'.</p>  | <p>Since the original purpose of the APA was concerned with identifying land for possible AONB extension, and since a detailed evaluation exercise has subsequently been completed – the APA is surely now vestigial?</p>   |



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| <b>Nov<br/>2023</b>    | <p>Adoption of Babergh and Mid Suffolk Joint Local Plan</p> <p>Policy LP17 relates to landscape and focuses on the conservation and enhancement of landscape character and local distinctiveness.</p> <p>Para 15.25 specifically references the project area which encompasses the Shotley Peninsula stating 'Whilst these project areas do not benefit from the same protection as the AONBs, development proposals in these areas should conserve their special qualities as identified in the Valued Landscape Assessments [2020], and where relevant seek to deliver enhancements where the special qualities have been impacted by changes in farming practices or previous development.' Policy LP18 relates to AONB/National Landscape and makes specific reference to the Project Areas 'Development within the AONB Project Areas should have regard to the relevant Valued Landscape Assessment.'</p> | <p>These policies make reference to a body of evidence about what is valued in this landscape. This body of evidence does not however move beyond being conclusory.</p> <p>The Appeal scheme does not remove or alter any of the valued qualities or components referenced in the Box 5.1 exercises. In that respect they are conserved and it thus complies with the policy.</p> <p><b>Furthermore</b>, the scheme does the very thing that the policy requires. <i>It delivers enhancements where the special qualities have been impacted by changes in farming practices or previous development</i> in the form of recreating a smaller scale field pattern in an area from which the historic pattern was erased c.50 years ago</p> |
| <b>2021</b>            | <p>Landscape Institute publishes Technical Guidance Note (TGN) on Assessing Landscape Value Outside of National Designations</p>  |   |
| <b>July<br/>2024</b>   | <p>Valued Landscape Assessment undertaken by Michelle Bolger for the area around the Appeal Site as part of the MBELC Review of the planning Application (CD B32).</p>  | <p>The TGN exercise undertaken by Michelle Bolger is conclusory in the same way as the Box 5.1 exercises.</p>   |
| <b>August<br/>2024</b> | <p>Bentley Historic Core, Proposed Conservation Area Appraisal and Management Plan Handforth Heritage</p>   |   |
| <b>April<br/>2025</b>  | <p>Bentley Conservation Area designated by Babergh District Council</p>   |   |
| <b>Nov<br/>2025</b>    | <p>Bentley Conservation Area Appraisal and Management Plan adopted</p>  |   |

