

18 March 2020

Katherine Hale
Planning Officer
Mid Suffolk District Council
Endeavour House
Ipswich, IP1 2BX

Dear Ms Hale

DC/20/00289 Planning Application. Erection of a petrol filling station (PFS), associated store and 2no. drive thru's and creation of new vehicular access. Land at Norwich Road Coddendam Suffolk

I am writing on behalf of the Suffolk Preservation Society (SPS) to object to the above application for development of an additional petrol filling station together with a shop and two drive thru restaurants on the A14/ A140 junction. We note that other respondents have questioned the need for additional facilities in this location and have raised highway safety concerns associated with the site. In addition to these, SPS would like to highlight our serious concerns regarding the impact of the proposals on the significance of the designated heritage assets of the grade 1 Shrubland Hall park and garden and the grade 2 lodge, Needham Lodge.

Heritage Impact

The site is a parcel of land immediately adjacent to Needham Lodge, the northern entrance to the designated parkland. SPS acknowledges that the setting of these assets is compromised by the modern road layout; however, the site currently provides a degree of separation and effective screening from the A14. An historic relationship remains between the site and the Lodge as the track entrance to the site is a remnant of Kettle Lane, the original route from Needham Market. The historic mapping clearly indicates that the elaborate lodge building with its sweeping curtain walls were designed and located to be a prominent entrance to the parkland at this point where Kettle Lane met Norwich Road. Therefore, contrary to the applicant's assertion at para 7.1 of the Planning Statement that the *site is largely undeveloped and therefore not serving any purpose*, the site forms an important part of the setting of both the Lodge and this part of the parkland. The proposed development will introduce an entirely alien built form, comprising brightly-lit single and two storey buildings, carparking, further lighting and signage into the immediate setting of the heritage assets, harming their significance through adverse changes to their setting. This will be compounded by a significant increase in noise and traffic accessing the site immediately opposite the lodge, further eroding its setting.

Landscaping

The Planning Statement, at para 7.37, refers to a landscaping plan which will minimise the impact of the development on the adjacent heritage assets. However no further details are provided and, disappointingly this plan is not amongst the submitted documents. It is therefore not possible to assess the full impact of the proposals on the heritage assets and the suitability of any proposed mitigation planting at this stage. The scant landscaping information available on the proposed site plan (no 190247) does not include any landscape planting in front of the existing boundary fence and indicates that the main access to the site together with lit totem signage will be immediately opposite the Lodge.

NPPF para 193 requires that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to its conservation. NPPF para 194 requires that all harm to heritage assets requires clear and convincing justification. SPS therefore urges that alternative locations for the scheme are considered due to the heritage harm which will result from the development. However if the local authority is minded to approve development of this site, we strongly recommend that amendments to the design are sought to reduce the impact on the Lodge and that, at a minimum, the current hedgerow which includes established trees is retained and enhanced to provide some filtering of views between the heritage assets and the development.

We hope that you find these comments helpful in the assessment of this case and would request that SPS is consulted on any amendments.

Yours sincerely,



Bethany Philbidge
BSc (Hons) MSc (Town Planning)
Planning Officer

Cc Chairman Coddensham Parish Council
Ward Councillors
BMSDC Heritage Team