

7 November 2023

Mr Isaac Stringer
Planning Officer
Mid Suffolk District Council
Endeavour House, 8 Russell Rd,
Ipswich, IP1 2BX

Dear Mr Stringer,

DC/22/01530 Full Planning Application - Installation of a solar array, associated infrastructure and construction of new vehicular access.

Land At Woodlands Farm Stowmarket Road Badley Suffolk

The Suffolk Preservation Society (SPS) has previously objected to the above application on the grounds of the harm that will result to the Badley Church Green Conservation Area which contains a grouping of heritage assets including St Mary's Church (grade I), Badley Hall (grade II*), barn (grade II*) and dovecote (grade II) and a designed landscaped approach from the east (Badley Walk) which passes between Keyfield Groves, remnants of ancient woodland.

We note that a Cultural Heritage Report has recently been submitted in response to concerns raised previously by SPS, Suffolk County Council, Babergh-Mid Suffolk District Council and Historic England. We welcome this report, but having carried out our own historical research, wish to respond to a number of the points that it raises:

Paragraph 2.1 of the Report refers to the considerable change that has occurred within the agricultural land surrounding Badley Hall, arguing that the surrounding land would historically have 'provided a very different agricultural setting than we see today'. SPS agrees with Historic England's view (response dated 3rd November 2023) that although the setting has been subject to changes in farming practices, it has not been developed and remains an open, green space, whose rural character continues to provide a significant setting for the heritage assets. SPS maintains its stance that introducing a distinctly industrial land use into the original rural setting of these highly designated heritage assets will negatively impact how they are experienced.

The Report helpfully refers to the 1741 survey of the Badley Hall estate carried out by William Collier for Ambrose Crowley, whose family owned the estate from 1735. The Report includes images of

portions of the survey drawing. An image of the entire survey, which shows the relationship of Badley Hall, Badley Church and the avenue with the wider landscape and with nearby Combs Hall and Combs Wood (also owned by Crowley), is not included and use is made of a modern copy on which the names of landscape features are not always accurately transcribed (Figure 1, page 3). SPS considers that the historic relationship between the Hall, avenue and wider landscape and the significance of the setting cannot be fully understood by taking this reduced view.

The Report suggests on several occasions in sections 2.2, 2.3 and 2.4 that the avenue (Badley Walk) and surrounding topography were intended to enclose, envelop and shield the historic buildings clustered at Badley Hall, and those journeying to them, from the outside world. This impression is gained from the way the landscape is managed today, but was not necessarily the historic intention. The current avenue planting cannot be historic as the 1884 edition 6" Ordnance Survey map shows a reduction in the number of avenue trees, and the 1902 25" OS map shows no avenue trees at all. The 1741 survey is thought to be a very accurate depiction of the landscape, and trouble is taken by the cartographer to differentiate areas of close woodland planting from areas of scattered trees or more formal planting.

A 1772 survey of the estate by Joseph Pennington has also been examined by SPS. The avenue shown on the 1741 and 1772 survey plans was double-planted formally with, it is presumed, elms. Formally-planted avenue trees would have been managed for aesthetic effect – most likely pollarded. The existing trees are not managed as they would have been historically. Rather than providing an impenetrable barrier to the outside world, the avenue would have guided people to Badley Hall while affording views across the surrounding landscape.

The Report states, on page 3, that the avenue had 'substantial lower-level mixed hedgerows'. It is not clear what historic evidence there is for this hedge; the boundary of the avenue is delineated on the 18th century surveys by a solid line but its meaning is not stated. The symmetrical areas of woodland called Key Field Groves, positioned roughly half way along the avenue, are clues to the original design intention and the way in which the avenue was meant to be experienced. On the 1741 survey they are labelled as 'old' and 'new' Key Field Grove, indicating that a considerably older area of woodland was deliberately mirrored in order to create a new designed landscape feature at a later date. These two groves, positioned at a high point in the landscape, would have provided a contrasting experience to those who travelled along the avenue, moving from the tree-lined avenue with views out across the fields, to an area enclosed by the denser woodland of Key Field Groves, before once again entering the lighter space of the avenue. Key Field Groves would only have worked as a contrasting landscape feature if the sense of seclusion they afforded was markedly different from the experience provided by the avenue. A similar concept of contrasting environments was used to the rear of the hall where the avenue continued to Badley Lane, offering views across the Great Park, and was ornamented midway by a large, circular pond. SPS considers that the avenue, areas of woodland, areas of water, the farmed landscape and parkland landscape were designed to work together to provide a setting for the hall and church and a varied landscape experience on approach.

SPS also considers that the historic link between Badley Hall and the (now demolished) nearby Combs Hall is significant and has not been adequately reflected in the Report. In 1735 Badley Hall, Combs Hall (which lay to the north west) and Columbyne Hall in Stowupland were all purchased by the Crowley Family. The landscapes belonging to Combs Hall and Badley Hall were therefore in single ownership from this date, and there was a route from one estate to the other which is preserved, in part, by a public right of way today. The proposed solar farm's location in such close proximity to Combs Wood is of concern to SPS. Combs Wood is an area of ancient woodland which was incorporated into the designed landscape surrounding Combs Hall in the 18th century, with vistas and rides cut through it. The two 18th century surveys show a broad vista cut through the western end of the wood with a circular pond to draw the eye at its northern end. No folly or eye catcher was placed at its southern end, which instead terminated with a view over the landscape. This view is now within the application area.

In summary, SPS disagrees with the conclusions in the applicant's Cultural Heritage Report that the cluster of historic buildings around Badley Hall was historically screened from the surrounding landscape. We consider that views of the landscape along the avenue approach were in fact designed as part of the wider setting of the heritage assets. We are therefore concerned that the Applicant continues to rely on intervisibility and screening when considering the heritage impacts of the proposals and fails to take into account that introducing a distinctly industrial land use into the rural setting of these highly designated heritage assets will negatively impact how they are experienced and thereby their significance. We therefore continue to object to the application and call for significant amendments to the scheme and consider that the previous reduction to zone A and set back of panels in zone F are insufficient to bring meaningful mitigation to the impacts of the proposals on this sensitive location.

We trust that you will find these comments helpful and ask to be reconsulted if there are any further amendments made to this application.

Yours sincerely,

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

Ccs:

Ward Councillor

Babergh/ Mid Suffolk Heritage Team

Parish Councils – Needham Market Town Council, Badley Parish Meeting

David Eve, Historic England