

29 July 2021

Ms Rachel Smith  
Planning Officer, East Suffolk Council,  
East Suffolk House, Riduna Park,  
Station Road, Melton,  
Woodbridge,  
IP12 1RT

Dear Ms Smith

**DC/21/2318/FUL Demolition of the White Horse Public House (Use Suis Generis) and the erection of a convenience store (Use E) on the ground floor and four apartments (Use C3) on the first floor, and the erection of two bungalows (Use C3) with associated parking and landscaping**

**The White Horse 33 Church Road Felixstowe Suffolk IP11 9NF**

Thank you for consulting the SPS on the recently submitted heritage assessment. Having carefully reviewed the document submitted in support of the demolition of the public house and redevelopment of the site, we would like to make the following comments:

### **The Heritage Assessment**

We are disappointed by the report which fails to identify the architect or accurately state the date at which the public house was built. It is understood to be designed by Thomas Cotman and it is claimed that the drawings are held by the Suffolk Record Office. However, the report makes no mention of these fundamentally important issues, essential on which to weigh the proposal for demolition of this undesignated heritage asset. If the White Horse can definitively be shown as one of Thomas Cotman's works, it will add significant weight to the case for its retention. As the report is silent on the name of the architect, the SPS considers that the heritage statement fails in its primary purpose which is to inform and provide clarity to help assess the importance of the heritage asset and the weight to be given to its protection.

In addition, the report is unclear about the age of the outbuildings, which appear to be contemporary with the public house based on an assessment of the submitted map regression. This confirms that they are post 1903 and appear on the 1926 map, therefore suggesting that they date from 1905, or shortly thereafter, when the pub was erected. It is therefore surprising that no

photographs of the outbuildings are included in the report, when these structures are also proposed for demolition.

Furthermore, the report having correctly identified at para 135 (now 203) the need to weigh in the balance the merits of the scheme against the merits of the proposals does not go on to carry out a robust assessment of the proposals nor does it attempt to make a meaningful attempt to weigh them against the loss of the White Horse. Having identified the correct procedure, it is extremely disappointing that the report does not carry out a proper assessment of the convenience store and bungalows. The report states at para 4.18 that *the proposed development would not result in any significant degree of harm, and any identified harm could be mitigated through a scheme of building recording. The proposed replacement building is of a similar scale and massing, and whilst differing in its architectural language, will still result in a neutral effect through the overall design and details.* The SPS wholly rejects this conclusion that recording a heritage asset will provide appropriate mitigation. If the weighing exercise is carried out correctly the only reasonable conclusion to be drawn is that the proposals will result in substantial harm to a heritage asset.

Finally, there are also a number of factual errors and mapping mistakes which do little to engender confidence in the overall quality of the document.

### **Assessment of the Proposals**

SPS considers that the design of the proposed convenience store lacks design quality nor does it attempt to respond positively to its context. Whilst of a comparable scale, albeit with greater massing, the proposed mansard building is utilitarian in nature and appears as a large shed with a poorly detailed mansard perched awkwardly on top of it. There is a depressing lack of detail regarding the brickwork, dormer detail, shopfront detail and signage. Furthermore, the metal steel security door on the front elevation and timber fencing around the service area results in an unattractive building that shows little attempt to provide a community facility that is pleasant to look at or will date well. The south elevation shows strange little windows lost in the massive brick gable end. The plastic shaft masquerading as a chimney stack primarily to house antennas, flanked by billboards will do little to make a positive contribution to the locality. In short, the proposals are woefully inadequate and in no way reflect the higher standards of design set out in the National Design Guide and the embodied within the latest version of the NPPF (20 July 2021) which seeks to significantly raise the quality of design.

Turning to the proposed bungalows to the north of the pub and to the south of the grade II\* St Andrews Church: the pair of bungalows are of a generic type that lack any quantifiable sense of design quality or make a positive contribution to a sense of place. This is another weakness of the scheme given that it is located in a sensitive location adjoining the highly graded church, on a prominent corner that affects the setting of the church when viewed from Church Street and Gosford Way. The side elevation of plot 1 faces onto the highway with only two small windows in an otherwise unrelieved brick façade. The north (rear) elevation faces onto the church and has only two small windows while the side elevation of plot 2 similarly lacks architectural distinction, being unfenestrated with the exception of one small window. Furthermore, these principal elevations face onto the highway and yet no details of the proposed brick, slate, boundary treatment or landscaping have been provided. This is another significant weakness of the scheme.

## **Weighing the loss of the heritage asset in the balance with the proposed scheme**

The NPPF at para 203 states that the *effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.*

In this case significant weight should be given to the historic and architectural importance of the asset, especially as it is understood to be by Thomas Cotman, an important local architect who is responsible for designing a number of significant buildings of townscape merit, including designated assets, in Felixstowe. If this can be demonstrated to the satisfaction of the local planning authority, this should be given significant weight in the balancing exercise. In addition, very limited weight should be given to the mediocre quality of the proposals which clearly lack design flair, contribution to a sense of place, quality of detailing or innovative use of materials or contemporary design. In the balancing exercise the total loss of the White Horse public house to this part of Felixstowe's historic townscape considerably outweighs the quality of the proposed redevelopment. On that basis the SPS strongly objects to the loss of the White Horse, a much-loved local heritage asset and urges refusal of this application.

SPS would like to be consulted on any further information or amendments that are submitted in support of this application. We trust that you find these comments helpful in the consideration of this case.

Yours sincerely,



**Fiona Cairns IHBC MRTPI**  
**Director**

Cc:  
Ward Councillors  
Design and Conservation Team ESC  
Felixstowe Town Council  
Felixstowe Society