

27 September 2023

Mr Grant Heal
Planning Officer, East Suffolk District Council
East Suffolk House
Station Road
Melton
Woodbridge
IP12 1RT

Dear Mr Heal,

DC/23/2745/DEM Prior Notification Demolition - Landguard Lodge is a 3 storey residential dwelling. Landguard Cottage is a 2 storey Residential dwelling directly adjacent to Landguard lodge. Landguard Lodge, Manor Terrace, Felixstowe, Suffolk IP11 2EL

I write on behalf of the Suffolk Preservation Society ('the Society') to object to the proposed demolition of Landguard Lodge and Landguard Cottage, both late nineteenth century buildings with an important military history in a prominent seafront location in Felixstowe. The online system bears witness to the strength of local objection to the loss of these distinctive heritage assets.

Having reviewed the application there does not appear to be a heritage statement submitted in support of the proposed demolition. The NPPF requires at paragraph 198 that: *In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. And at para 190 it continues. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.*

The SPS considers that Landguard Lodge and Cottage have the potential to be considered non-designated heritage assets. Paragraph 11.37 of the Suffolk Coastal Local Plan (2020) sets out the criteria that should be used *'to establish if any potential non-designated heritage asset that is a building or structure meets the definition in the National Planning Policy Framework at an early stage in the process, as advised by the national Planning Practice Guidance. A building or structure must meet two or more of these*

significance-measuring criteria to be identified by the Council as a non-designated heritage asset. Greater weight should be attributed to the conservation of any building or structure that meets more than two of the significance-measuring criteria. The weight attributed should be reflective of the number of criteria met.' These adopted criteria are explained further in Appendix 1 of East Suffolk Council's Historic Environment Supplementary Planning Document (2021).

SPS considers that Landguard Lodge and Cottage meet more than two criteria, namely those for archaeological interest, architectural interest and historic interest. From map and archival evidence, the buildings can be dated to the last quarter of the 19th century. They do not appear on the 1st edition of the 25" OS map (1881) but archival evidence from 1894 records the death at Landguard Lodge of a prominent judge, George Darell Shee, indicating that the house was present by then. The buildings are shown on the 1902 edition of the 25" OS map. The Lodge has the character of a picturesque marine villa and, with the Cottage, was built in association with an isolated area of late 19th century development which included Manor Terrace and the Manor Hotel (demolished 2013), located at some distance to the south of the main areas of Victorian and Edwardian expansion in Felixstowe. The Lodge is architecturally distinctive and playful, incorporating a tower, castellated parapets, bay windows, prominent hood moulds, and mullion and transom windows.

By 1900 Landguard Lodge was home to John Henry Balguy, a Major in the Royal Artillery, and the 1902 OS 25" map indicates that it had a War Department boundary stone (number 11) immediately adjacent to it. This military association is of great significance, and Landguard Lodge and its ancillary buildings were to become key components of the wartime infrastructure on the Landguard Peninsular. The Landguard Nature Reserve Management Plan 2021- 2026 includes a list of military buildings and structures on the Landguard Peninsular, drawn up from a 1944 Air Ministry plan with amendments through to 1962. Each building or structure was numbered on the plan. Landguard Lodge is annotated WD225 and is identified as the Old Officers Mess, Stables & Stores. The WD prefix was applied to 264 structures within Landguard Barracks and other areas on the Air Ministry plan, of which few survive. Landguard Lodge is mentioned in the Historic Environment Record for Manor House Battery (record FX212), an emergency battery constructed in the summer of 1940, and is identified as the site of the command post and accommodation buildings. It is included within the shaded area defining the boundary of the Manor House battery heritage asset, which is sited immediately adjacent to the Landguard Scheduled Ancient Monument.

The isolated location of the buildings when first constructed meant that they were very conspicuous in the landscape, as can be seen from early aerial photographs. The holiday park which has developed around them is all at low level, and Landguard Lodge and Cottage are still prominent and cherished landmarks sited on the northern boundary of the Landguard Nature Reserve.

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.* Local Plan Policy SCLP11.6 states that *proposals for the re-use of Non-Designated Heritage Assets which are buildings or structures will be supported if compatible with the elements of the fabric and setting of the building or*

structure which contribute to its significance. Applications, including those for a change of use, which result in harm to the significance of a Non-Designated Heritage Asset will be judged based on the balance of the scale of any harm or loss, and the significance of the heritage asset. The total demolition of Landguard Lodge and Cottage constitute substantial harm to these assets.

In this case significant weight should be given to the archaeological, historic and architectural importance of the assets, particularly their military connections, and we would strongly recommend that the applicant is required to submit a heritage assessment and impact report. The total loss of Landguard Lodge and Landguard Cottage from Felixstowe's skyline considerably outweighs the benefit derived from additional holiday park accommodation. On that basis the SPS strongly objects to the proposed demolition and urges refusal of this application.

The 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,

Anna Forrest
BA (Hons) MA FSA
Heritage and Research Officer

Ccs:

Ward Councillor

East Suffolk Heritage Team

Felixstowe Town Council