

21 April 2020

Mr Joe Blackmore
Planning Department
East Suffolk District Council
Riverside, 4 Canning Road
Lowestoft, NR33 0EQ

Dear Mr Blackmore

DC/20/0653/FUL | Demolition of existing shed buildings and 3/4 storey brick building to rear of Post Office, including adjoining structures to rear of Post Office. Making essential repairs to Post Office building and modifications (thermal and watertight) to rear wall of Post Office building at ground floor level. Erection of flats and houses comprising 9 dwellings, with associated landscaping works. - Post Office 51 London Road North Lowestoft Suffolk NR32 1AA

Summary

I write on behalf on the Suffolk Preservation Society (SPS) regarding the above application for the part redevelopment of the post office site. We welcome the redevelopment of this redundant brownfield site and have no objection to the principle of residential use. The Post Office building and Nat. West. bank are designated heritage assets (grade II) and set within the South Lowestoft Conservation Area. In principle we support the redevelopment of brownfield sites in highly sustainable locations which we consider to be a central tenet of sustainable planning. Redevelopment of the site offers genuine exciting opportunities to better reveal the significance of the designated assets and enhance the character and appearance of the conservation area. However, we are disappointed that the proposals do not include the redundant listed Post Office but focus on the later elements of the sorting office and bicycle repair workshops. We also have concerns about the loss of the turn of the century, three storey buff brick faced rear extension which has not been fully assessed. Furthermore, the scale, layout and design of the proposed scheme has the potential to harm the setting of heritage assets and the character of the conservation area. Accordingly, we wish to make the following comments on the proposals:

Inadequate Heritage Assessment

The Heritage Assessment (HA) is wholly inadequate and fails to adequately assess the parts of the Post Office which are identified for demolition. It is of concern that the Planning Statement, which includes the HA, is a mere two sentences and does not provide sufficient information to properly identify the architectural and historic significance of the buff brick extension of the Post Office on which to base a proper understanding of its importance and thereby its demolition. Furthermore, the Design and Access statement states at page 33 *The proposal is for a "backlands" urban infill site,*

meaning the majority of the proposed built form would not be seen from the High Street and therefore not affect the grade II listed Post Office. The proposed design of the Surrey Street elevation complements the adjacent grade II listed Bank building by picking up horizontal banding/datum lines and vertical window proportions, whilst “completing” the street frontage by replacing the utilitarian sheds that currently exist. This shows a distinct lack of understanding that the Post Office is listed in its entirety, including all the later accretions which are identified for demolition. The Society recommends that the application should not progress in the absence of a comprehensive HA undertaken by a specialist heritage professional and a full schedule of works to the listed building.

Impact of proposals on the listed Post Office

The loss of the buff brick 3 storey rear extension will result in a degree of harm to the significance of the listed building as it is functionally related to the Post Office. The staircase, the internal decorative treatment of white glazed wall tiles is contemporary with the Post Office. The racking within this building is also suggestive of a repair shop for the postmen’s bicycles, and is therefore of historic interest. However, the much later single storey elements are of lesser architectural or historic interest and present a significant opportunity to enhance the setting of the post office and the conservation area. In addition, we note that the works of repair to the Post Office are not clearly set out within a schedule of works nor marked up on a series of plans. This is a serious omission and poses difficulties in a proper assessment of the proposals.

Block 3 – No.5 3 bed townhouses to rear of Post Office

The scale and form of the three-storey townhouses in the small backland site has the potential to harm the setting of the Post Office. The Society considers that the proposals represent over development resulting in a poorly designed scheme with negligible amenity space and poor outlook onto the rear elevations of adjacent large commercial buildings. A flatted scheme with shared communal space might be more appropriate. Furthermore, the available open space is dominated by car parking at the expense of any amenity space. It is acknowledged that as a town centre site, it is appropriate to make the most efficient use of land. However, the scheme is arguably overbearing, cramped and does not seek to maximise the potential amenity and outlook for residents and neither enhances the setting of the listed Post Office and adjoining bank, nor the character or appearance of the wider conservation area.

Block 1 – 4 storey block of No. 2 bed flats Surrey Street

We are concerned that the 4.5 storey block fails to respect the architectural hierarchy of scale within Surrey Street. The height of the block exceeds that of the ridge height of the adjacent Victorian property to the west being materially higher than the Nat West Bank on the east, which steps down from the London Road frontage. While we are supportive of high-quality contemporary design, we question the massing of the flat roofed block set between two High Victorian buildings which have strong silhouettes and characterised by pitched and hipped roofs.

The scheme does not respond positively to many of the principles of good design as set out in the National Design Guide (October 2019). The development does not seek to enhance its surroundings but maximises site coverage. The built form does not follow a coherent pattern of development as it ignores the established hierarchy of taller building on primary frontages and much lower scaled development in backland locations. Furthermore, the layout does not provide accessible and easy movement through the site. There is little attempt to enhance or optimize

nature and there is no safe, social or inclusive public space. The National Design Guide calls for homes that are functional, healthy and sustainable while the proposals involve negligible garden space and poor outlook onto the backs of buildings.

Policy Considerations

The NPPF places a strong emphasis on good design and para. 127 clearly states a requirement that decisions should ensure that developments will function well and add to the overall quality of the area, are visually attractive, sympathetic to local character and history, including the surrounding built environment and landscape setting. Good design should establish a strong sense of place to create attractive, welcoming and distinctive places while optimizing the potential of the site to sustain an **appropriate amount** (my emphasis) and mix of development including green and other public space, and to create places that are safe, inclusive and accessible with a high standard of amenity. Para. 130 states that *Permission should be refused for development of poor design that fails to take the opportunities available for improving character and quality of an area and the way it functions*. In addition, the NPPF requires at para.200 that lpa's when considering schemes affecting the setting of heritage assets and conservation areas should look for opportunities to *enhance or better reveal their significance*.

The Waveney Local Plan Policy WLP8.29 - Design – requires development proposals to *demonstrate high quality design which reflects local distinctiveness*. Proposals should (inter alia) *demonstrate a clear understanding of the form and character of the built, historic and natural environment; respond to local context and the form of surrounding buildings in relation to the overall scale and character; height and massing of existing buildings*. In addition, WLP8.29 requires proposals to respond to local context in respect to *the relationship between buildings and spaces and the wider street scene or townscape*.

Conclusion

Insufficient information has been provided to demonstrate that a scheme for 9 new dwellings can be satisfactorily accommodated on this sensitive site, particularly in terms of its impact on the setting of heritage assets and streetscape.

SPS calls for a better understanding of the elements of the listed building which have been identified for demolition. Furthermore, we consider that if it can be demonstrated that the public benefits of the proposed residential development outweigh the heritage harm, a much-reduced scheme should be sought, both in terms of scale and number of units. A courtyard development scheme, of two storey units, which creates a strong sense of place with high quality residential amenity would better safeguard the setting of heritage assets and enhance the conservation area. Furthermore, we would advocate the scheme foregoes any parking provision in view of its town centre location with access to excellent public transport. This would, in turn, allow for the provision of amenity/open space for the benefit of residents.

We trust that you will find these comments helpful in the assessment of this case and request that we are consulted on any amendments to this scheme.

Yours sincerely,

Fiona Cairns IHBC MRTPI

Director

Cc: Lowestoft Town Council

Lowestoft Civic Society

Ward Councillor

Lynette Fawkes - Historic England

Elizabeth Martin - Conservation Officer, ESC

J de Grazia - SPS Waveney District