



Committee Report

Planning committee - 12 March 2024

Application no DC/23/0792/FUL

Location

Post Office
51 London Road North
Lowestoft
Suffolk
NR32 1AA

Expiry date 21 June 2023
Application type Full Application
Applicant East Suffolk Council

Parish Lowestoft

Proposal Adaptive reuse of grade II listed post office and auxiliary buildings for multifunctional art based centre. Development comprising:
Conversion of listed post office building to provide 4no. artist studios, art gallery and associated facilities;
Gallery use at connecting hall (former sorting hall) between post office and gault building;
Conversion of Gault Building to provide gallery use, 4no. studios / residential provision, and associated facilities;
New build lift, stair core and store & loading area;
New build Cafe with covered outdoor seating and associated facilities;
New build Artist Studio and associated facilities connecting to the open flexible space at the rear of the site; and
New build ground level DDA compliant accommodation in bedroom annex.

Case Officer Katherine Rawlins
01502 523018
Katherine.Rawlins@eastsoffolk.gov.uk

1. Summary

- 1.1 The application seeks full planning permission for the re-purposing/redevelopment of the former Post Office site. The application is made by East Suffolk Council, on Council owned land, therefore the application has been brought direct to Planning Committee (North) for determination.
- 1.2 Lowestoft is an example of a Town Centre in decline with vacancy rates approximately double the national average. In recent years, East Suffolk Council has taken a more proactive approach to regeneration and economic development through a number of projects, including: Lowestoft Town Investment Plan; Town Centre Masterplan; Heritage Action Zones (north and south); and the Making Waves Together Project. The aims of these projects are translated into Local Plan policy objectives, and reflective broadly of the National Planning Policy Framework and central government policy on enhancing the vitality and viability of town centres. The Post Office has been vacant for a number of years, but permission has been granted by the Council for remedial works and repairs to the building in this period, that have been undertaken.
- 1.3 This application proposes to re-purpose a landmark building within Lowestoft Town Centre for a mixed-use development as a multifunctional arts based centre, comprising:
 - o Conversion of listed post office building to provide 6no. artist studios, art gallery and associated facilities;
 - o Gallery use at connecting hall (former sorting hall) between post office and gault building;
 - o Conversion of Gault Building to provide gallery use and 4no. studio units of residential accommodation, and associated facilities;
 - o New build lift, stair core and store & loading area;
 - o New build Cafe with covered outdoor seating and associated facilities; and
 - o New build Artist Studio and associated facilities connecting to the open flexible space at the rear of the site.
- 1.4 The application delivers significant public benefits in the form of the re-use and adaptation of this important, Grade II listed landmark building within Lowestoft Town Centre, and associated ancillary buildings, including the Gault Building - a non-designated heritage asset in its own right - with a mixed use development that includes a gallery use within the former sorting hall of the post office, and artists' studios, retail unit associated with the gallery use within the ground floor of the listed former post office, ancillary accommodation studios for visiting artists within the Gault building, and new build element at the rear with a new café and enhanced public realm to Surrey Street within the Conservation Area.

2. Site Description

- 2.1 The application site is located to the west side of London Road North, and to the south side of Surrey Street, within the South Lowestoft Conservation Area. The Old Post Office is a Grade II Listed Building dating from the 19th Century - three storeys in height and constructed of buff brick with stone facing, fronting onto London Road North. It has been vacant for a number of years. There is a side access to the site, from Surrey Street. London Road North is a pedestrianised high street. At the point of site access from Surrey Street, this transitions from a highway to pedestrianised street where it then joins London Road North.

- 2.2 To the rear of the main (front) Post Office building are a number of ancillary structures and buildings comprising: The Sorting Office and the Three-Storey Building (which are both constructed of gault white brick); a glass roofed rear lean-to extension; a covered way attached to the three-storey element; and the concrete framed/corrugated cement roofed structure to the rear.
- 2.3 The site has the following planning history:
- o DC/81/1000/FUL - renewal of canopy to loading bay - permitted.
 - o DC/90/0647/FUL - disabled persons ramp access - permitted.
 - o DC/09/0328/LBC - replace 2no. existing projecting illuminated lozenge with 1no. new projecting sign. Carry out various internal decoration works including replacement flooring, posters and queuing system - permitted.
 - o DC/12/0027/FUL - replace defective sorting hall roof with new felt covering and general repairs and improvements - permitted.
 - o DC/14/0799/FUL & DC/14/0800/LBC - removal of external stamp vending machine and formation of two internal rooms - permitted.
 - o 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. Repair & adaptation to the ground floor of the Post Office building including a new extension to the west and re-fenestration at ground floor level. Erection of flats and houses comprising 9 dwellings, with associated landscaping works -permitted.
 - o DC/20/1783/LBC - Listed Building Consent - Repair & adaptation to the ground floor of the Post Office building including a new extension to the west, new roof to ground floor extension and re-fenestration at ground floor level - permitted.
 - o DC/21/4219/FUL - Conservation repairs to the former post office, New ground floor fenestration & entrance doors. Removal of external ramp, installation of new ramp to front entrance. Repairs & replacement, to external building fabric. Permitted.
 - o DC/21/4220/LBC - Listed Building Consent - Repair & refurbishment of timber sash windows, stone repair & infill at ground floor, new windows & doors at ground floor, new rainwater goods to replace existing, replacement of roof tiles, flat roof covering in lead, stone cleaning on front facade. Minor internal strip out to facilitate repairs & refurbishment and repair & replacement of roof access lantern. Permitted.
- 2.4 The site is located within the Lowestoft town settlement boundary and falls within Environment Agency flood zone 2.
- 2.5 Although not a formal planning designation, the site falls within the South Lowestoft Heritage Action Zone (HAZ) which is a heritage-led regeneration project led by Historic England in partnership with ESC.

3. Proposal

- 3.1 The proposal seeks to bring the Post Office and associated ancillary buildings back into a mixed commercial, retail (in association with the gallery use), and leisure use, with ancillary artists' studios, workshops, and ancillary café, including new build element towards the rear of the site. The original scheme has been subject to considerable revision, with final amended plans submitted for re-consultation on 09 January 2024.

- 3.2 The arts space would be run by Messums, who are recognised for revitalising old buildings and embedding them within communities through artistic enterprise, and sculptor Laurence Edwards who began his art education in Lowestoft and subsequently developed an international reputation for large scale public works from his base in East Suffolk. The hub, known as Messums East, would provide a working studio for Laurence Edwards, in addition to spaces for a revolving residency of international, national, and regional artists, as well as exhibition spaces and screening room, and a café/restaurant. Laurence Edwards would also be working to create a large-scale bronze landmark sculpture for Lowestoft, casting it at his foundry in East Suffolk.
- 3.3 The proposed development therefore relates to both the Post Office building and its associated land to the rear, including the adaptation and re-use of the Gault building, into a multi-functional art-based centre with new retail unit in association with the gallery use, artists' studios, including artists accommodation within the Gault building, and new build elements to the rear of the site, to include the provision of a new café with covered seating area. In total six artists' studios are proposed within the main post office building, including a local artists gallery, teaching space and private exhibition space, in addition to the main gallery within the former post office sorting office, and four studios as short-term living accommodation for artists within the Gault building. A tandem application for listed building is submitted for Listed Building works as part of proposals for adaptive reuse of grade II listed post office (and auxiliary buildings) for multifunctional art based centre (DC/23/1407/LBC).
- 3.4 Work to the main Post Office building:
Adaptation of the former post office to ground floor retail unit with entrance to London Road North and local artist display area; first and second floor artists work studios with ancillary office space, communal meeting space, incorporating private gallery, local artist gallery, classroom space and teaching galley; new external stair core and lift access at ground-third floor level (cargo and wheelchair accessible lift);
- 3.5 Works to the sorting office and Gault building:
Adaptation and re-use of the former Post Office sorting office hall to art gallery, with gallery entrance; adaptation of Gault building to create four artists residential accommodation units (studios), incorporating 2 DDA compliant studios at first floor level, accessed via existing stairwell with new internal platform lift; and ancillary staff areas at third floor level.
- 3.6 Development to the rear:
Demolition of all unlisted adjoining structures and buildings to the rear of the Post Office and the Gault building, and the construction of ancillary café space, incorporating covered outdoor seating area, plant rooms, storage buildings, work, and wax studio, with cycle storage and ancillary plant roof, and new service yard. Secure cycle storage would be provided within the new build element for the proposed artists' studios and refuse/recycling storage, covered outdoor seating associated with the ancillary café and plant room.
- 3.7 The application, along with the tandem listed building consent application, has been subject to a number of design revisions and requests for further information, the most significant of which relates to the removal of extensive roof top plant from the former sorting office building to the main gallery. The amended scheme also includes the retention of the glazed roof lantern to the rear of the listed former Post Office, the provision of cycle storage for the artists accommodation within the Gault building, and the removal of a ground floor DDA compliant artist's studio within the new build element, owing to flood risk concerns. Two DDA

compliant studios are now proposed at first floor level within the Gault building, along with provision of a platform lift, and cycle storage is proposed for the visiting artists accommodation. Additional information has been provided by the applicant to address the initial comments of the Council's Heritage Office, and re-consultation has taken place with Suffolk County Highways Authority and the Lead Local Flood Authority, in addition to Heritage.

3.8 The application is supported by the following documents:

- o Design and Access Statement
- o Heritage Statement
- o Flood Risk Assessment and Drainage Strategy
- o Ecology Report
- o Site Investigation Report
- o Fire Strategy
- o Signage Strategy, along with 3D Visualisations of the Proposed Scheme

4. Consultations/comments

Response to Original Scheme and First Round of Consultation

4.1 No third-party representations.

Response to Second Round of Consultation

4.2 1 third party representation from CBRE Planning and Development on behalf of Lloyds Bank plc:

- Request a structural survey, demolition method statement and construction method statement be prepared and submitted to East Suffolk Council ahead of determination to address concerns relating to the implementation of the proposals. If this not possible, request the conditions relating to these matters are attached as planning conditions and Lloyds Bank is notified of the discharge of conditions.

4.3 Response to Third Round of Consultation

No further third party representations

5. Consultees

Consultee	Date consulted	Date reply received
Lowestoft Town Council	11 May 2023	7 June 2023
Summary of comments: It was agreed to recommend approval of the application.		

Consultee	Date consulted	Date reply received
-----------	----------------	---------------------

Historic England	11 May 2023	31 May 2023
<p>Summary of comments:</p> <p>Historic England has no objection to the application on heritage grounds.</p> <p>We consider that the application meets the requirements of the NPPF, in particular paragraph numbers 7, 8, 199, 200 and 202. In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.</p>		

Consultee	Date consulted	Date reply received
Historic England	N/A	14 June 2023
<p>Summary of comments:</p> <p>Historic England has no objection to the application on heritage grounds. We consider that the application meets the requirements of the NPPF, in particular paragraph numbers 7, 8, 199, 200 and 202. In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.</p>		

Consultee	Date consulted	Date reply received
Environment Agency - Drainage	11 May 2023	No response
<p>Summary of comments:</p>		

Consultee	Date consulted	Date reply received
SCC Highways Department	11 May 2023	15 June 2023
<p>Summary of comments:</p> <p>Holding Objection. Space is retained for deliveries. It appears no parking has been provided for staff and visitors which is contrary to guidance found within Suffolk Guidance for Parking 2019.</p> <p>As the proposal is located in an urban area where there is good provision of public transport we would allow a relaxation of parking standards, this complies with SGP 2019 page 34. This section states that such developments must be designed to provide exceptional standards of sustainable transport.</p> <p>The applicant should consider exceptional modes of sustainable travel such as but not limited to:</p> <ul style="list-style-type: none"> - Exceeding the minimum amount of cycle spaces as set out within Suffolk Guidance for Parking 2019 and ensuring the spaces provided are in a secure, covered and lit area. - Facilities for electrical cycle charging. 		

- Powered two-wheeler parking.
- Efficient, secure spaces for cargo bikes.

Consultee	Date consulted	Date reply received
SCC County Archaeological Unit	11 May 2023	No response
Summary of comments:		

Consultee	Date consulted	Date reply received
East Suffolk Design And Conservation	11 May 2023	9 June 2023
<p>Summary of comments: Further information is required before the proposals can be fully considered and the relevant NPPF tests applied.</p> <p>Summary of additional information required:</p> <ul style="list-style-type: none"> o Details relating to fire should include: compartmentalisation, fire suppression, and surface and structure upgrades. o Details relating to thermal upgrading should include: location, depth and type of any new insulation. o Details relating to M&E should include: what provision is necessary in each space, how much and what type of plant is necessary and where it would be located and indicative service run locations. o Advice should be sought on whether the scheme as proposed conforms with all the relevant building regulations o Lean to covered storage - section drawing and materials details o The current condition of the rooflight should be surveyed at this stage to allow us to understand whether works would be repairs, like for like replacement or replacement with a different design. o Studio 6 - either retained as two smaller spaces or a internal partition that can be opened. o Information on any suspended ceilings proposed o Confirmation is required that all the plant associated with the lift can be accommodated within the structure shown o Any changes to the design of the lift/stair tower to ensure that it is structurally sound o Confirm internal finish in Sorting Office o Indicative signage details for café. 		

Consultee	Date consulted	Date reply received
East Suffolk Environmental Protection	11 May 2023	2 June 2023
<p>Summary of comments: Object. This is a complex site with many different land uses. An initial Noise Assessment is required. A Demolition and Construction Management Plan is to be secured by condition. A Phase I</p>		

and Phase II Contamination Assessment and Remediation, and Validation, and Unsuspected Contamination being discovered, is to be secured by planning condition.

Consultee	Date consulted	Date reply received
East Suffolk Ecology	11 May 2023	31 May 2023

Summary of comments:

Should permission be granted, planning conditions in respect of ecological mitigation, compensation and enhancement measures should be included.

A financial contribution to the Suffolk RAMs Mitigation Strategy (or equivalent mitigation identified via a Habitats Regulations Assessment (HRA)) is required in order to mitigate in-combination recreational disturbance impacts on habitats sites (European designated sites) arising from new residential development.

Consultee	Date consulted	Date reply received
East Suffolk Economic Development	11 May 2023	No response

Summary of comments:

Re-consultation consultees

Consultee	Date consulted	Date reply received
SCC Highways Department	20 October 2023	5 December 2023

Summary of comments:

Holding Objection remains due to a lack of information.

Consultee	Date consulted	Date reply received
SCC Highways Department	22 January 2024	7 February 2024

Summary of comments:

No objection, subject to conditions.

Consultee	Date consulted	Date reply received
SCC Flooding Authority	7 November 2023	20 November 2023

Summary of comments:

Holding Objection. The applicant has not provided a drainage strategy as part of the application.

Consultee	Date consulted	Date reply received
SCC Flooding Authority	22 January 2024	No response
Summary of comments:		

Consultee	Date consulted	Date reply received
East Suffolk Design And Conservation	20 October 2023	28 November 2023
Summary of comments: Additional information is awaited from the applicant.		

Consultee	Date consulted	Date reply received
East Suffolk Design And Conservation	22 January 2024	8 February 2024
Summary of comments: Planning conditions are recommended in the event of the application being approved.		

Consultee	Date consulted	Date reply received
East Suffolk Environmental Protection	20 October 2023	24 November 2023
Summary of comments: No objection, subject to conditions to secure odour control measures and a Noise Impact Assessment from fixed plant and machinery.		

6. Publicity

The application has been the subject of the following press advertisement:

Category	Published	Expiry	Publication
Conservation Area	5 May 2023	30 May 2023	Lowestoft Journal
Category	Published	Expiry	Publication
Conservation Area	5 May 2023	30 May 2023	Beccles and Bungay Journal

7. Site notices

General Site Notice

Reason for site notice: Conservation Area; Listed Building

Date posted: 12 May 2023

Expiry date: 5 June 2023

8. Planning policy

WLP1.1 - Scale and Location of Growth (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP1.2 - Settlement Boundaries (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.18 - New Town Centre Use Development (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.19 - Vitality and Viability of Town Centres (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.24 - Flood Risk (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.29 - Design (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.37 - Historic Environment (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.38 - Non-Designated Heritage Assets (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.39 - Conservation Areas (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

National Planning Policy Framework 2023 (NPPF)

9. Planning Considerations

Policy Background

- 9.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that "If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise." This is reflected in paragraph 47 of the NPPF which affirms the statutory status of the development plan as the starting point for decision-making.
- 9.2 The Development Plan for this part of the District comprises the East Suffolk Council - Adopted Waveney Local Plan (2019) and any Adopted Neighbourhood Plans. The Draft Lowestoft Neighbourhood Plan (Regulation 14 Consultation Draft, October 2023) is at an early stage, and therefore policies have no weight. The relevant policies of the Development Pan are listed

in section 8 above. The NPPF, paragraph 11, requires that planning decisions apply a presumption in favour of sustainable development and that means, for decision-taking, approved development proposals that accord with an up-to-date Development Plan, without delay.

Principle of Development

- 9.3 The application site is located within Lowestoft Town Centre as defined in the Local Plan. Policies WLP1.1 and WLP1.2 set out broadly, that new development is to be directed to the defined settlement boundaries, with the majority of development over the Plan period 2014-2036 allocated to Lowestoft, as the largest Town Centre in the District. The NPPF at Appendix 2 also defines Main Town Centre uses, including retail development, leisure, arts, and cultural development, including galleries. The principle of mixed-use development in Lowestoft Town Centre, is entirely supported therefore in the Local Plan.

Vitality and Viability of Lowestoft Town Centre

- 9.4 Across the UK, there is a national trend of Town Centre decline, exacerbated by the recent Pandemic, with a rise in the number of vacant and redundant retail units. High Streets and town centres need to adapt to changing economic circumstances, with a variety of different retail, leisure, and cultural uses, highlighted in the recent report by Central Government: Ministry for Housing, Communities and Local Government (MHCLG) published its report 'High Streets and Town Centres in 2030'. Paragraph 90 of the National Planning Policy Framework states that planning decisions should support the role that town centres play, by taking a positive approach to their growth, management, and change, by allowing them to grow and diversify in a way that can respond to changes in retail and leisure industries and allow a mix of uses.
- 9.5 Within the context of Lowestoft, the Retail and Leisure Needs Assessment for East Suffolk District (2016) carried out health checks across all the District's Town Centre, and identified that town centres were generally performing well, but Lowestoft had above average number of vacant retail units and required environmental improvements. The application site has been vacant for a number of years but has been subject to remedial works in the interim by the Council to the main Grade II listed Post Office building, permitted by applications DC/21/4219/FUL and DC/21/4220/LBC. This reflects the proactive role taken by the Council to regeneration and economic development within the Town Centre through a number of projects, including, but not limited to: the Lowestoft Town Investment Plan; Town Centre Master Plan; Heritage Action Zones (north and south); and The Making Waves Together Project. The aims and objectives of these projects is to enhance the vitality and viability of Lowestoft Town Centre.
- 9.6 Policies WLP8.18 (New Town Centre Use Development) and WLP8.19 (Vitality and Viability of Town Centres) are relevant. These policies seek to ensure that retail, leisure, cultural and community uses are directed to the Primary and Secondary shopping frontages, in order to support their vitality and viability, and to increase pedestrian footfall, with out-of-town developments to follow a sequential approach that prioritises Town Centres as the primary focus for regeneration and investment, to reflect paragraph 91 of the NPPF. Paragraph 97 of the NPPF adds that planning decisions should plan positively for the provision of shared spaces, community facilities, such as cultural buildings and meeting places.

- 9.7 The Post Office is an imposing building within the Primary Retail frontage of Lowestoft Town Centre. Although remedial works have been undertaken to the façade of the Grade II listed building, with funding from the Towns Fund and Historic England, the building's continued vacancy and lack of pedestrian activity/footfall detracts from the character and vitality of the Town. This proposal seeks to incorporate a retail unit associated with the gallery use within the ground floor of the vacant post office, plus a local artists display area, to showcase and sell artists work on exhibition within the main gallery space within the former sorting office. Entrance to the main gallery space would be via the rear of the retail unit, with a variety of artists workshops for travelling artists.
- 9.8 The arts space would be run by Messums, who are recognised for revitalising old buildings and embedding them within communities through artistic enterprise, and sculptor Laurence Edwards, who began his art education in Lowestoft, has subsequently developed an international reputation for large scale public works from his base in East Suffolk. The hub, known as Messums East, would provide a working studio for Laurence Edwards, in addition to spaces for a revolving residency of international, national, and regional artists, as well as exhibition spaces and screening room, and a café/restaurant. In planning terms, applying the policy considerations above, the refurbishment of the ground floor of the Post Office building is a positive. Whilst the whole building is important, it is clear from the ground-floor-focus of policy WLP8.19 that commercial uses of ground floor premises are a critical part of the high street and primary shopping frontages. The provision of the new café area, with pedestrian access from Surrey Street, also within the Primary retail frontage, would also enliven this area with increased pedestrian footfall and activity.
- 9.9 In regard to the proposed residential accommodation for travelling artists, contained within the Gault building, this element of the proposed scheme, would provide short term residential accommodation for visiting artists and occupancy would be conditioned as such. The re-purposing of the Gault building for residential use, reflects NPPF paragraphs 124 b) c) e) by giving substantial weight to the re-use of brown field land; encouraging multiple benefits from urban land; and supporting opportunities to use airspace above commercial premises. Significant weight is also placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development (paragraph 85 of the NPPF). This application would have a wider economic impact by employing 14 FTE staff, in addition to showcasing art from both world renowned and local visiting artists. Historic England is fully supportive of the proposed use, as the new facilities would form a key part of the legacy of the current Heritage Action Zone scheme. The application therefore complies with policies WLP1.1, WLP8.18 and WLP8.19 of the Adopted Waveney Local Plan (2019).

Heritage Considerations and Design of Development

Design

- 9.10 Policy WLP8.29 requires all new developments to achieve a high standard of design that reflects local distinctiveness. The South Lowestoft and Kirkley Conservation Area Appraisal identifies the feature of the townscape, including the prevailing materials. It also sets out criteria for successful new development.
- o Relate to the geography and history of the place and the lie of the land;

- o Positively respond to the pattern of existing development and routes through and around it (including public footpaths);
- o Respect important views;
- o Respond to the scale of neighbouring buildings;
- o Use local, traditional and high quality materials; and
- o Use high quality building methods that respond to existing buildings in the area.

9.11 Policy WLP8.30 establishes that developments should be designed to support the needs of older people and those with dementia through the creation of environments which are familiar, legible, distinctive, accessible, comfortable, and safe. Paragraph 135 of the NPPF details (amongst other things) that planning policies and decisions should ensure that developments function well and add to the overall quality of the area. To achieve this, developments must be visually attractive as a result of good architecture, layout, and effective landscaping. Moreover, developments must establish a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming, and distinctive places to live, work, and visit.

9.12 The proposed development incorporates a number of new build elements into the former Post Office site while retaining the three principal buildings - the listed former Post Office building, the former sorting office, and the gault building. The new build elements are of a high-quality contemporary design. The lift tower is visually prominent due to its scale, but the design and materials have been carefully considered to minimise this impact. The lightweight metal and glazed design break up the massing and provides a contrast to the solid brick of the historic buildings. The top of the lift tower sits at the eaves level of the historic building, ensuring that it reads as subservient and does not disrupt the historic roofscape. Services and storage are provided within a flat roofed linking building that has a vertical timber clad finish; the scale and materials of this element means that it would be visually recessive, not drawing the eye from the more historic parts of the site. The new café building reflects the gault brick finish and gabled roof form seen across the site in a contemporary way and has a large, glazed opening onto Surrey Street providing an open and welcoming aspect from this approach.

9.13 It is of note, particularly in relation to Policy WLP8.30, that the proposals have been designed to increase accessibility across the site. This has resulted in the installation of the main lift tower allowing accessible access to all three floors of the main listed building and the provision of a lift up to the first floor of the gault building to provide two accessible rooms for overnight accommodation. Accessible WCs are provided both for the main gallery and within the café.

9.14 The Senior Design and Heritage Officer has been engaged throughout the process and the proposals have been the subject of extensive pre-application and post-application engagement and changes have been made in response to the Officer's request, particularly in relation to the design of the lift tower. Officers conclude that the result is a design that successfully incorporates new build elements into this important landmark site allowing its regeneration. The historic principal elevation remains unchanged but the more ad-hoc, modern parts of the site to the rear are proposed to be removed and replaced with high quality contemporary design which is visually attractive and is locally distinctive, replicating the materials and features of the historic parts of the site in a contemporary way.

9.15 Overall, it is considered that the proposed development would represent a very high standard of design and accessibility in accordance with Policies WLP8.29 and WLP8.30. Likewise, the proposed development would comply with the design objectives contained within the NPPF.

Heritage

9.16 Policy WLP8.37 requires development proposals to conserve or enhance heritage assets and their settings and WLP8.38 Non-designated Heritage Assets and WLP8.39 Conservation Areas set out specific criteria relating to proposals affecting this type of heritage asset. The adopted Historic Environment SPD provides further guidance on a range of topics including conservation areas, listed buildings and non-designated heritage assets, and sustainable construction and renewable energy.

9.17 The above policy objectives are consistent with the policies contained in chapter 16 of the NPPF which recognises the importance of heritage assets and the subsequent importance of sustaining and enhancing their significance. Notably, paragraph 203 states that in determining planning applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets, alongside recognising the positive contribution that the conservation of heritage assets can make to sustainable communities including their economic vitality. It concludes by emphasising the desirability of new development making a positive contribution to local character and distinctiveness.

9.18 Paragraph 205 of the NPPF indicates that when considering the impact of a proposed development on the significance of a heritage asset, great weight should be given to the asset's conservation irrespective of whether any potential harm is considered to be substantial or less than substantial.

9.19 Paragraph 209 of the NPPF sets out 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 doing so, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

9.20 The Council also has statutory duties, under s.66(1) and s.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, to have special regard to the desirability of preserving the significance of listed buildings and the desirability of preserving or enhancing the character and appearance of conservation areas, respectively.

9.21 The former Post Office building that fronts onto London Road North is a Grade II listed building, the former sorting office and the gault building have been identified as non-designated heritage assets (NDHAs). The whole site is situated within the South Lowestoft and Kirkley Conservation Area. As the building is listed in part due to its group value with the adjacent Grade II listed bank, consideration also needs to be given to potential impacts on the significance of this building.

9.22 The Council's Senior Design and Heritage Officer is supportive of the proposals and the design approach. The repurposing of this important landmark building will ensure that it remains a feature of the community, ensures the long-term conservation of the building and improves the building's accessibility. These combine to amount to a significant conservation benefit of the proposal.

- 9.23 Throughout the process the Senior Design and Heritage Officer suggested a number of clarifications and alterations to the proposals, in consultation with planning officers, which resulted in the provision of additional information relating to fire protection; the structure of the lift tower, and the mechanical and electrical provision; as well as minor changes to internal layouts. As concluded within the design section of this report the proposed new build elements represent a high standard of design. There would be a very minor loss of historic fabric as part of the proposal, but this is considered to have a neutral impact on the significance of the listed building. There would be substantial heritage benefits from the renovation of the listed building which includes the repair and reinstatement of important historic features such as cornicing and panelling.
- 9.24 The Senior Design and Heritage Officer concludes that the overall impact of the proposals on the Grade II listed former Post Office would be beneficial, leading to the preservation and enhancement of its special interest and group value. Bringing this important, landmark building back into a viable use is a significant heritage benefit of this scheme, ensuring that it can be used and enjoyed by the wider community. Officers conclude that the proposals would both preserve and enhance the character and appearance of the Conservation Area, bringing vitality back into the High Street and incorporating high quality contemporary design through the new build elements of the site. There would be very limited change to the external appearance of the gault building and sorting office and therefore their significance as non-designated heritage assets would not be impacted by the proposals.
- 9.25 Historic England has been consulted on the proposals due to their previous involvement at pre-application stage following their position as a key partner in the London Road, Lowestoft High Street Heritage Action Zone. Historic England's response outlines support of the application on heritage grounds and confirms that the matters raised in their pre-application response have been addressed.
- 9.26 In the absence of harm to any heritage assets, the relevant balancing tests set out at paragraphs 207, 208, and 209 of the NPPF are not engaged. Notwithstanding this, even if harm were to be identified to any of the affected heritage assets, it would be 'less than substantial' and the extensive public benefits arising from the proposed development would significantly and demonstrably outweigh any such harm. Therefore, in either scenario the scheme is acceptable in heritage terms.
- 9.27 To summarise, the proposed development would preserve the special interest and group value of the Grade II listed former Post Office and preserve and enhance the character and appearance of the South Lowestoft and Kirkley Conservation Area, thereby complying with Policies WLP2.9 and WLP8.37, in addition to the heritage policies and objectives contained within the NPPF. The local planning authority could therefore grant planning permission in accordance with its statutory duties under s.66(1) and s.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Residential Amenity

- 9.28 Policy WLP8.29 seeks to protect the amenity of the wider environment and neighbouring uses. Because the rear land of the Post Office has always been covered by large buildings and structures, there would not likely be materially significant amenity impact on neighbouring land uses arising from this scheme. Notwithstanding this, the application would result in a

more intensive use of this site, with a variety of different land uses in the form of a medium density mixed use scheme, in addition to new build elements at the rear.

- 9.29 Whilst the immediate vicinity of the application site is characterised mainly by retail and commercial buildings, including Natwest Bank and Lloyds Bank adjacent, to the north and south of the site respectively, there are residential flats located immediately to the rear of the application site on Surrey Street, to the west. It is proposed to demolish part of the former sorting office building to the rear of the site, and to erect a new build element, with a single storey building with pitched roof and sloping eaves (maximum height to ridge and eaves of 8.99 metres and 6.87 metres AOD, respectively). This part of the site would also contain a service area that would be a hub of activity with café use and external seating area, refuse collection/storage, cycle storage, as well as access to the rear of the proposed gallery for exhibition deliveries.
- 9.30 The new build elements containing the café and external seating area would be offset approximately 2.06 metres from the adjoining apartments, with an alleyway to these properties retained and new gated access to Surrey Street proposed. The height and profile of this building would be kept to a single storey, which is comparable to the existing situation, in order to minimise any loss of outlook/light to first floor flank windows. Whilst there would be increased activity taking place within the café and service yard area, this has to be weighed in the context of the Town Centre location, which is characterised by mixed retail/commercial and some residential properties. Environmental Health officers have been consulted on this proposal, and, based on their recent comments and submission of further information from the applicant relating to noise impacts (Noise Impact Assessment - Acoustic Consultancy Report ADT 3555/ENIA) to determine existing ambient noise levels at the site, no objection is raised in principle to the proposed development, subject to further details of building services yet to be selected, including the extract ventilation system for the café. The Noise Assessment adds that noise limits for new fixed plant installations have been set, in accordance with the relevant British Standard guidance for a 'low impact'. An acoustic assessment would be necessary, however, for approval by the LPA prior to the first use of the café in respect of extractor vents, and that, where correctly specified and attenuated (if necessary), there would be no unreasonable disturbance to nearby noise sensitive receptors in the adjacent flats. The applicant has also confirmed that in respect of the outdoor seating area, which would be a covered seating area with glazed rooflights, this would be used no later than 23.00 hours, which in the context of this Town Centre location, is considered to be reasonable, subject to a planning condition to control the hours.
- 9.31 In relation to odour impacts associated with the café, Environmental Health officers consider the impacts could be adequately controlled by suitable plant and attenuation equipment, the details of which could be secured by planning condition, prior to first use of the café.
- 9.32 In respect of the proposed artists accommodation studios within the Gault Building, there would be existing windows overlooking the café area and service yard, as well as the gallery space. The Noise Assessment identifies that internal acoustic sound insulation would be required, and higher performance glazing and trickle vents to control external noise intrusion to indoor levels recommended in the relevant British Standard. In view of the fact that the artists accommodation is intended to be for short term occupancy for visiting artists, and would not be considered suitable for permanent occupancy, owing to the small size of the units (which fall below Technical housing standards - nationally described space standards for studio flats) a planning condition is required to control the occupancy as ancillary

accommodation in connection with the primary use of the site as a multi-functional art-based centre.

Highways Safety and Sustainable Transport

- 9.33 Local Plan policy WLP8.21 relates to sustainable transport and seeks, amongst other things, to locate and design development so it can be accessed via multiple modes of transportation, and with safe and suitable access for all. NPPF paragraph 115 gives clear guidance that: *"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."*
- 9.34 The application site occupies a highly sustainable location in the centre of Lowestoft within the Town Centre boundary and is accessible via a wide variety of different modes of private and public transport, including by car, bus, train, cyclists, and pedestrians. There are a number of public car parks within walking distance of the application site, as well as the station and bus station, and it is anticipated that a proportion of trips to the proposed development would be linked trips with surrounding retail and commercial uses.
- 9.35 Suffolk County Highways Authority initially objected to the application, owing to a lack of parking for staff or visitors, contrary to their Suffolk County Highways Adopted Parking Standards (2023).
- 9.36 The total proposed floor area with this development amounts to 1658 sq. metres with a variety of different land uses proposed, including Class E (a) retail, Class F1 (b) display of works of art (otherwise than for sale or hire), and Class E(b) for the sale of food and drink for consumption (mostly) on the premises. The proposed studio space(s) are more akin to either light industrial use or office uses, in addition to residential accommodation falling under Class C3. Such a mixed-use development would therefore be Sui Generis (i.e. a use that does not fall within a defined use class). Whilst acknowledging that this is a mixed-use scheme, based on the Adopted Parking Standards for a retail use falling under Class E(a), there would be a total parking requirement of 82 parking spaces and 16 cycle spaces based on the floor area. This gives a general indication of the kind of parking requirement needed for a commercial premises of this size, based on the Suffolk County Highways Adopted Parking Standards (2023). However, reductions to parking standards are appropriate in main urban areas, in locations having frequent and extensive opportunities for public transport, cycling, and walking links; in close proximity to local services; and on-street parking controls at all times, where a proposal is designed to be exceptionally sustainable in transport terms.
- 9.37 It is clear that owing to the site constraints and the extent of land ownership, there would be no space to accommodate any off-street parking within the site. But the application site occupies a highly sustainable location within the Town Centre boundary and is accessible by a wide variety of different modes of private and public transport, including by car, bus, train, cyclists, and pedestrians. There are a number of public car parks within walking distance of the application site, as well as the railway station and bus station and a proportion of trips would be linked trips with surrounding retail and commercial uses. There are Traffic Regulation Orders and parking restrictions in force along London Road North and Surrey Street.
- 9.38 Following significant revisions and, in response to the initial objection from the County Highways Authority, the amended scheme incorporates secured covered cycle storage (10

spaces) for the proposed artists accommodation (in the Gault building) that would be located at ground floor level, accessible from the main service area from Surrey Street, within the new build element towards the rear of the site. The County Highways Authority has therefore removed their initial objection based on amended plans, subject to planning considerations to secure cycle storage and refuse/recycling storage that is also located within the new build element towards the rear of the site, with access for refuse vehicles from Surrey Street. Additional cycle storage is nearby, off-site, that could be used for general visitors and guests.

Flood Risk and Surface Water Drainage

Flood Risk

- 9.39 Policy WLP8.24 sets out that *"Proposals for new development, or the intensification of existing development, will not be permitted in areas at high risk from flooding, i.e. Flood Zones 2 and 3, unless the applicant has satisfied the safety requirements in the Flood Risk National Planning Policy Guidance (and any successor)"*.
- 9.40 The application site is located within Environment Agency (EA) Flood Zone 2 - this is a medium probability flood zone that comprises land assessed as having between a 1 in 200 and 1 in 1000 annual probability of fluvial flooding in any year. The finished floor level of the Post office is raised up above street level and is stated as being 3.67 metres AOD, based on the submitted Flood Risk Assessment. The site is also within an area benefitting from the Environment Agency's flood warning service. Flood levels are predicted to rise in future, owing to climate change, and the Lowestoft Flood Relief Protection Management Project seeks to provide flood protection for Lowestoft with a standard of protection of 1 in 200 including allowance for climate change.
- 9.41 Development proposals at risk of flooding (taking into account the impacts of climate change) should only be granted permission if there are no suitable alternative sites in areas of lower flood risk; the benefits in terms of sustainability outweigh the flood risk; and a site specific Flood Risk Assessment is submitted for all development located in Flood Zones 2 and 3 (and for development of 1ha or more in Flood Zone 1) which demonstrates that the site can satisfactorily mitigate over the lifetime of the development, to comply with paragraph 168 of the NPPF.
- 9.42 The Technical Flood Risk Guidance to the National Planning Policy Framework (2023) identifies buildings used for professional and other services, including commercial buildings, such as shops, café, galleries, as being classified as a 'less vulnerable' form of development in flood risk terms, as referred to in the applicant's Flood Risk Assessment. Such uses are considered to be appropriate in Flood Zone 2.
- 9.43 The NPPF seeks to mitigate the risk of flooding by restricting vulnerable new development (such as housing) within areas at risk from flooding. It does this by requiring development proposals in areas at risk from flooding to be subject to a sequential test where it has to be proven there are no suitable areas of land with a lesser risk of flooding and an exception test which identifies sustainability benefits of development and ensures the development is safe for its lifetime.
- 9.44 The applicant has not considered sequentially preferable sites at lower risk of flooding for the proposed artists' accommodation but, given that the proposal is a comprehensive re-

development of the Post Office site (including bringing the ground floor back into commercial use), the Local Planning Authority considers the site to be unique and there would not be a similar alternative at lower risk of flooding. Furthermore, these studios are intended for short-term, rather than permanent occupancy. The submitted FRA does not consider the proposed residential accommodation for visiting artists within the Gault building, which is a 'more vulnerable' form of development in flood risk terms. Therefore, at the request of officers, the applicant has amended the proposed scheme, by removing a ground floor DDA compliant studio, owing to officer concerns regarding flood risk in a location that is at medium risk of flooding. All the short-term residential accommodation for visiting artists is now proposed to be located at first and second floor level within the Gault building, with lift access (as two of the units at first floor level would be DDA compliant).

- 9.45 The Flood Risk Assessment details mitigation measures in the event of a flood. The site is already within a location that benefits from the Environment Agency's flood warning service, and the business manager for the development would register with the flood warning service and appoint a flood coordinator to receive flood warnings, that would give 12-24 hours' notice in the event of a flood event. A Flood Evacuation Plan would also be completed, including procedures to be followed in the event of a flood warning. Flood Evacuation routes are shown within the Flood Risk Assessment (Figure 10): route 1 moves north along London Road North and is approximately 150m long to a safe area; and route 2 moves west along Surrey Street and then north along Clapham Road South and is approximately 160m long to a safe area.
- 9.46 Officers therefore consider that based on the submission of amended plans, the proposed flood risk mitigation measures as detailed within the applicant's Flood Risk Assessment, and in the longer term, the implementation of the Lowestoft Flood Relief Protection Management Project, the proposed development complies with policy WLP8.24 and the National Planning Policy Framework in regard to flood risk.

Surface Water Drainage

- 9.47 Surface water from the site currently drains via the existing connections to the public sewer, as detailed in the applicant's Flood Risk Assessment. Suffolk County Council as Lead Local Flood Authority has been consulted on this application and initially raised an objection, owing to a requirement for the applicant to limit the surface water discharge rate to a restricted 2 litres per second and apply sustainable urban drainage principles, where feasible. In response, the applicant has provided a surface water drainage strategy to address the objection from the LLFA. The proposed surface water drainage strategy would comprise an attenuated system (with an attenuation crate to be located beneath the service yard at the rear of the site) to connect to the existing surface water sewer, with the service yard surfacing material finished in porous paving, to allow for some infiltration to the below ground attenuation crate. The LLFA is supportive of the overall drainage strategy, as this would be a betterment of an existing unrestricted discharge by restricting the rate to 8l/s. The applicant is currently awaiting confirmation from Anglian Water of their acceptance of this flow rate. Therefore, subject to confirmation from Anglian Water and planning conditions to secure a detailed surface water drainage strategy, the proposal complies with policy WLP8.24.

Ecology and Habitats Regulations Assessment

- 9.48 The application is supported by a Preliminary Ecological Appraisal. The Ecological Survey concludes that the site has very low value for wildlife at the local level, with no significant

natural habitats identified on site and negligible potential in the building for either roosting bats or nesting birds. No follow-up ecological surveys have therefore been carried out by the applicant, but ecological avoidance and enhancement measures are detailed at section 5 of the Ecology Survey; this would include the addition of bird boxes, provision of part of the roof within the development to be made available for black redstarts to forage and nest on, and the inclusion of climbing plants, where feasible. The Council's ecologist is satisfied with the conclusions of the consultant, subject conditions to secure ecological enhancement.

- 9.49 The Habitats Regulations Assessments (HRAs) of the Suffolk Coastal District Council Core Strategy and Development Management Policies Development Plan Document (2011 and 2013) and the Waveney District Council Local Plan (2019) identified that increased levels of residential development would have a Likely Significant Effect (LSE) on Habitats sites (European designated sites) on the Suffolk coast. The LSE is predicted to arise from increased levels of recreational use resulting from residents of new development. This would be an in-combination effect as a result of the total amount of new housing growth in the district.
- 9.50 Following the findings of the Local Plan HRAs and under direction from Natural England, the Local Planning Authorities with residential growth in areas which are likely to impact on Suffolk coast Habitats sites, have worked collaboratively to prepare and implement a mitigation strategy to address the identified LSE and prevent cumulative new development resulting in an adverse effect on the integrity of the designated sites. The LPAs involved are East Suffolk Council (formerly Suffolk Coastal District Council and Waveney District Council); Babergh and Mid Suffolk District Councils and Ipswich Borough Council. This strategy is currently referred to as the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy or "Suffolk Coast RAMS". The strategy identifies that new residential development within 13km of the Habitats sites identified in the Technical Report will contribute to in-combination recreational disturbance impacts. This area is referred to as the Zone of Influence (ZOI).
- 9.51 Officers have carried out a stage 2 Appropriate Assessment under the Conservation of Habitats and Species Regulations (2017) in consultation with the Council's Ecology Team and conclude that, subject to the accommodation being occupied solely by visiting artists for a short term period of no more than 56 days in any calendar year, a financial contribution to fund the Suffolk Coast RAMS would not be necessary in this instance, and the proposed development would not have an adverse effect on the integrity of the European sites within the 13km ZOI, from recreational disturbance, when considered 'in combination' with other development. Officers have taken advice from the Council's Ecologist on this application, as this is a unique situation, owing to the nature of the proposed residential accommodation, which is ancillary to the primary use as a multifunctional arts centre, and would be for short term occupancy by visiting artists, and is neither for permanent occupancy, nor holiday accommodation. The proposal therefore accords with Policy WLP8.34.

Other Matters - Contaminated Land, Demolition and Construction Impacts, Structural Survey

- 9.52 The submitted ground investigation report identifies limited ground contamination and therefore standard conditions are recommended by the Environmental Health Officers to deal with this prior to the development being occupied.
- 9.53 Owing to the site's location in a very busy and constrained mixed use area, in which such activities are likely to have a significant impact on existing businesses and residential

properties, a Demolition and Construction Management Plan is recommended by Environmental Health Officers and Suffolk County Highways. This is illustrated by the third-party representation received from Lloyds Bank, who occupy one of the closest adjoining buildings to the application site. This would ensure that such building activities are carried out efficiently and with due regard to minimising the impacts arising from all forms of pollution (including noise, vibration, dust, water, waste storage etc).

10. Conclusion

- 10.1 In summary, Lowestoft is an example of a town centre in decline with vacancy rates approximately double the national average. In Lowestoft town centre property values are comparatively low when considered alongside other towns. In recent years East Suffolk Council has taken a more proactive approach to regeneration and economic development through a number of projects including: the Lowestoft Town Investment Plan; Town Centre Master Plan; Heritage Action Zones (north and south); and The Making Waves Together Project. The aims of these projects are translated into the Local Plan policy objectives, and reflective broadly of the NPPF and central government policy on enhancing the vitality and viability of town centres. Although remedial works have been undertaken to the façade of the Grade II listed building, with funding from the Towns Fund and Historic England, the building's continued vacancy and lack of pedestrian activity/footfall detracts from the character and vitality of the Town.
- 10.2 The proposed development would deliver significant public benefits in the form of the re-use and adaptation of this important, Grade II listed landmark building within Lowestoft Town Centre, and associated ancillary buildings, including the Gault Building - a non-designated heritage asset in its own right - with a mixed use development, including gallery use within the former sorting hall of the post office and artists' studios, retail unit within the ground floor of the listed former post office, ancillary accommodation studios for travelling artists within the Gault building, and new build element at the rear with a new café and enhanced public realm to Surrey Street. The arts space would be run by Messums, who are recognised for revitalising old buildings and embedding them within communities through artistic enterprise, and sculptor Laurence Edwards who began his art education in Lowestoft and subsequently developed an international reputation for large scale public works from his base in East Suffolk.
- 10.3 Considering all of the issues, with regard to all material considerations raised during the consultation period and giving great weight to the preservation of designated and non-designated heritage assets, the planning balance clearly indicates in favour of the proposal. The proposal is considered to represent a sustainable development in accordance with the Local Plan and NPPF, and planning permission should therefore be granted.

11. Recommendation

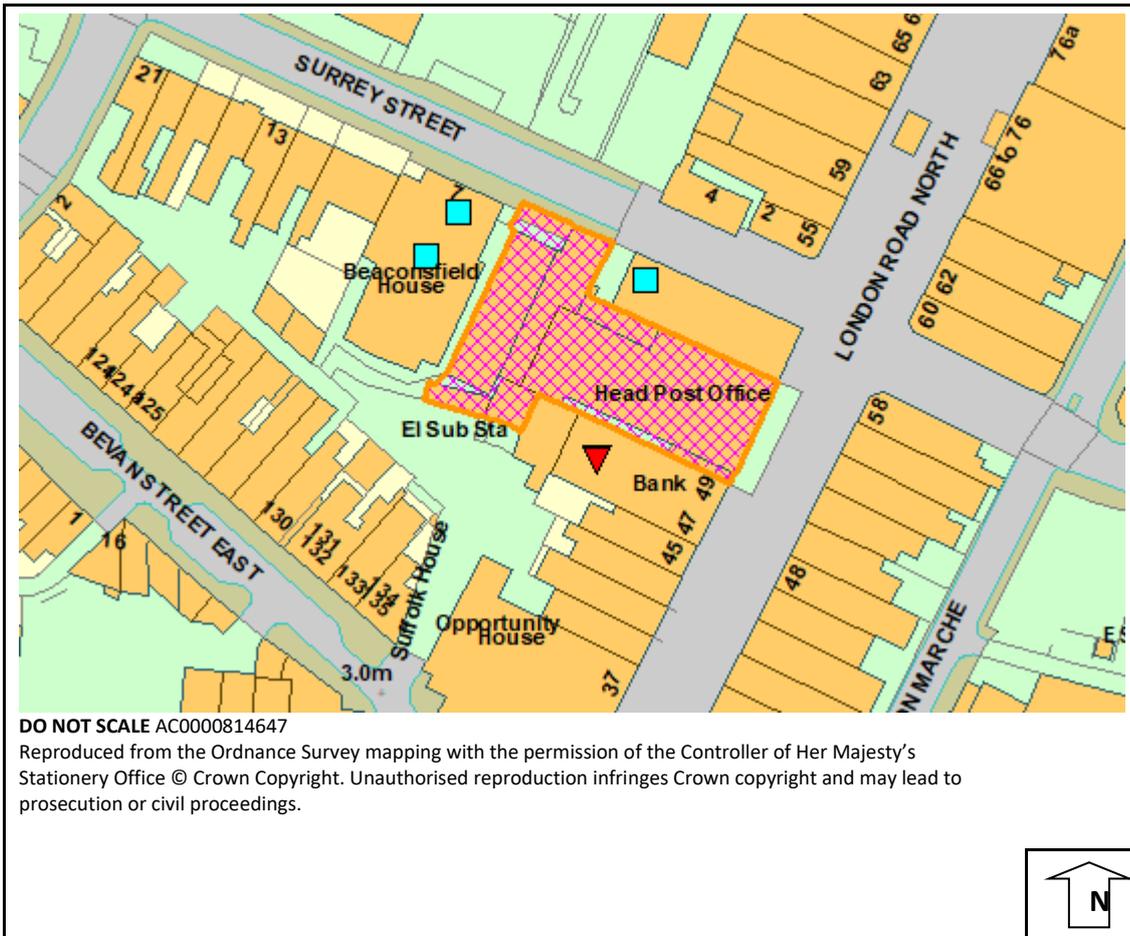
- 11.1 Authority to approve, with planning conditions including (but not limited to) those summarised below:
1. Three year time limit;
 2. Standard compliance condition;

3. Prior to its installation full details of the staircase in the lift tower, including materials and banister design, should be submitted to and agreed by the LPA;
4. Prior to construction of new build elements full material specification should be submitted to and agreed by the LPA;
5. Prior to their installation full details of any new gates should be submitted to and agreed by the LPA;
6. No demolition shall commence until a record is made of the buildings to be removed. The record should consist of plans, elevations, and photographs. This record should be deposited with the Historic Environment Record prior to completion of the works; and for deposition to be confirmed to the council as soon as possible following;
7. Prior to their installation full details of any external plant should be submitted to and agreed by the LPA;
8. Hard landscaping strategy to be agreed and implemented prior to occupation;
9. Odour control and mitigation measures for all extract plant;
10. Noise Assessment and mitigation measures for all plant and machinery;
11. Outdoor seating area to operate no later than 23.00 hours;
12. Café hours of operation to be 09:00 to 23:00 hours;
13. Contamination - Phase I and Phase II Contamination Reports and Remediation where appropriate;
14. Action in the Event of Unsuspected contamination;
15. Highways - Demolition and Construction Environmental Management Plan to be agreed prior to the commencement of development;
16. Highways - Refuse and Recycling Storage to be provided and maintained;
17. Highways - Cycle Storage to be provided prior to first occupation;
18. Ecological mitigation avoidance and enhancement measures to be secured;
19. Artist's accommodation to be occupied for no more than 56 days in any calendar year and to be ancillary to the primary use as a multifunctional arts based centre;
20. Surface water drainage strategy to be in accordance with approved strategy;
21. No development shall commence until details of the implementation, maintenance and management of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the LPA;
22. Details of surface water drainage strategy and piped networks to be submitted to and approved in writing by the Local Planning Authority for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register; and
23. Flood Risk Mitigation measures to be implemented prior to first occupation of the development and maintained as such thereafter.

Background information

See application reference DC/23/0792/FUL on [Public Access](#)

Map



Key



Notified, no comments received



Objection



Representation



Support