



Committee Report

Planning Committee North – 12 January 2021

Application no DC/20/1783/LBC

Location

Lowestoft Post Office
51 London Road North
Lowestoft
NR32 1AA

Expiry date 8 July 2020 (Extension of time to 15 January 2021)

Application type Listed Building Consent

Applicant East Suffolk Council

Parish Lowestoft

Proposal 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.

Case Officer Joe Blackmore, Principal Planner (Development Management)
01394 444733

Joe.Blackmore@eastsoffolk.gov.uk

1. Summary

- 1.1 The application seeks listed building consent for works to the Grade II Listed Lowestoft Post Office. The application is made by East Suffolk Council, on council-owned land, therefore the application has been brought direct to Planning Committee for determination.
- 1.2 The proposal will enable an important ground floor space of a Grade II Listed Building to be brought back into a viable use within the High Street and South Lowestoft Conservation Area. In conjunction with the tandem planning application (DC/20/0653/FUL), the proposal will deliver on a number of key regeneration and town centre enhancement objectives.
- 1.3 Officers consider that the detailed works to the Listed Building will facilitate bringing it back into a viable use, which is an important conservation and public benefit of the works. Harm to the significance of the Listed Building would be limited and outweighed by the benefits arising. Officers therefore positively support the proposals and recommend that listed building consent be granted.

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 approximately four 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 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 This application looks to create a commercial unit letting space to the ground floor of the listed building, which involves internal alterations; a rear extension; and replacement of windows and doors to the front fenestration of the openings to the front elevation.
- 3.2 During the extended determination period, there has been considerable engagement between the applicant, planning officers, and Historic England. The applicant has sought to work positively with officers and amend their development proposals to address feedback from Historic England.
- 3.3 In terms of this Listed Building Consent application, the amended proposals include:
 - Programme of cleaning the entire façade stonework (methodology to be agreed by condition).
 - The windows on the ground floor will be replaced with plate glass fixed units (metal framed) in a window pattern that reflects the upper floor sash window arrangement.
 - The roof form of the rear extension has been amended from a lean-to roof, to a flat roof (in order to retain internally the cornice in the main front space and the supervisor's booth overlooking the sorting office)

4. Consultations/comments

- 4.1 Two letters of Objection from local residents raising the following key concerns (inter alia):
 - Heritage statement is inaccurate.
 - Support the objections raised by Suffolk Preservation Society and Mr Ivan Bunn.

- Proposal is incompatible with the objectives of the Heritage Action Zone.
- Will cause harm to the listed building adjacent the new development.
- Will detract from the character and heritage of the conservation area.
- The housing will have limited outlook, light, and only small gardens - poor amenity standards.
- Cramped form of development.
- Already too many small flats in central Lowestoft.
- Demolition of buildings contributes to carbon footprint and renovation would be more sustainable.
- Proposal is over development of the site.
- The proposal is not in the best interests of the future of the Post Office building.

4.2 In response to the amended plans/details, received 27 November 2020, there have been no further third-party representations received in respect of this LBC application.

5. Consultees

Town Council

Consultee	Date consulted	Date reply received
Lowestoft Town Council	19 May 2020	10 June 2020
<p>Summary of comments: <i>"The Planning and Environment Committee of Lowestoft Town Council considered this application at a meeting on 9 June 2020. It was agreed to recommend REFUSAL of the application due to the lack of sufficient information to fully consider the merits of the application given the heritage of the building. In particular, the Town Council are keen to see the issues and safeguards (in relation to the facade, windows and lack of work to the first floor) as outlined in Historic England's consultation response addressed and, therefore, the requirements of the NPPF being met."</i></p> <p>Planning Officer Note: See final LTC comments received 18 December 2020.</p>		

Statutory consultees

Consultee	Date consulted	Date reply received
Historic England	20 May 2020	9 June 2020
<p>Summary of comments: Object to the application on heritage grounds. Planning Officer Note: comments updated by final response dated 15 December 2020</p>		
Consultee	Date consulted	Date reply received
National Amenity Societies	20 May 2020	19 June 2020

Summary of comments:
 Council for British Archaeology:
 Broadly supportive of the adaptive reuse of the old Lowestoft Post Office site.
 However, consider the Heritage Statement submitted to be inadequate, and believe the proposals should relate to the whole of the Listed Building, rather than just ground floor.

Non statutory consultees

Consultee	Date consulted	Date reply received
Suffolk Preservation Society	20 May 2020	11 June 2020

Summary of comments:
 Raise concerns with the proposal, concurring with the views of Historic England.

Consultee	Date consulted	Date reply received
Design And Conservation (Internal)	19 May 2020	18 June 2020

Summary of comments:
 Internal planning consultee. See officer report for planning analysis.

Re-consultation consultees

Consultee	Date consulted	Date reply received
Historic England		14 August 2020

Summary of comments:
 Object to the application on heritage grounds.
 Planning Officer Note: comments updated by final response dated 15 December 2020

Consultee	Date consulted	Date reply received
Lowestoft Town Council	30 November 2020	18 December 2020

Summary of comments:
"The Town Council's Planning and Environment Committee considered this application at a meeting on 15 December 2020. It was agreed to recommend REFUSAL of the application as presented.

The Planning Authority should consider the comments submitted by Historic England (on 15 December) and local historian, Mr I Bunn, and seek to correct factual errors within the Heritage Impact Assessment before this application is considered further. The Town Council does not support the design of the new extension and would wish to secure a higher level of design for this heritage building which is within the London Road, Lowestoft High Street Heritage Action Zone."

Consultee	Date consulted	Date reply received
Historic England	30 November 2020	15 December 2020

Summary of comments:

“Some revisions to the scheme have been made and some remain a cause of concern. Plan LBC-203 indicates the design of the extension to the rear of the old post office has now become flat roofed. This is in line with our previous comments to your local authority however, the parapet detailing is weak and is out of proportion with the rest of the built form. This could be improved by making more of a feature of the parapet.

The method of cleaning the front façade and precise details of fenestration (including fire doors), details of repair to the oriel window and brick bond as well as a sample panel showing pointing and mortar to be used, should also form the subject of a listed building condition. A specification of works for the restoration of the interior cornice in the former banking hall should also be provided by condition.

The Implementation plan indicates some remediation works to the upper floor will take place to prevent deterioration. A full schedule and specification of works should be provided to state what these works are and how they will be carried out.”

Recommendation

Historic England has concerns regarding the applications on heritage grounds. We consider that the gault brick building is able to be retained and reused and that sufficient justification on heritage grounds, for its demolition has not been provided. We have suggested some amendments and conditions for the submitted schemes should your local authority be minded to approve these applications.”

Consultee	Date consulted	Date reply received
National Amenity Societies	20 May 2020	19 June 2020

Summary of comments:

Council for British Archaeology:

The CBA support the proposed ‘making good’ of the ground floor, including the conservation of key features relating to the building’s significance, in order to achieve an active frontage to the building as well as a flexible function on the ground floor. The internal and external works will contribute well towards Lowestoft’s HS HAZ work. We believe the rationale behind the phased approach to conserving and reusing the whole of the principal building is justified by the iterative use of the building in finding the best end use as part of the HAZ.

The CBA recommend that any excavation at the rear of the site presents a place shaping opportunity for public participation, which could further feed into the Heritage Action Zone work.

6. Publicity

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

Category	Published	Expiry	Publication
Conservation Area; Listed Building	5 June 2020	26 June 2020	Beccles and Bungay Journal

Category	Published	Expiry	Publication
Conservation Area; Listed Building	5 June 2020	26 June 2020	Lowestoft Journal

7. Planning policy

National Planning Policy Framework 2019 (NPPF)

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

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

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

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

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

8. Planning considerations

The Role of the Listed Building in the High Street

- 8.1 The Post Office building is within a Local Plan policy-defined primary shopping frontage and has been vacant for almost four years. The Post Office is an important building on the High Street and its current, vacant appearance detracts from the character and vitality of the area. The driver of the proposed development is to refurbish the ground floor of the Post Office building and create a 'white box' space that can quickly be brought back into commercial use by an operator. A commercial space that is ready-to-go is said, by the applicant, to be an important part of securing a commercial tenant because prevalent independent retailers do not have the capital expenditure budget required to fit out the space for use.
- 8.2 Whilst there are detailed elements of the physical works involved to the listed building (to be considered later in this report) the principle of creating a commercially attractive ground floor space for an operator is a highly significant benefit of the proposals. Bringing ground floor commercial premises in the high street and primary shopping frontages back into use is a clear objective of both local and national planning policy, and the re-purposing of part of the listed building will help ensure its long-term conservation. This weighs heavily in favour of the scheme.

Listing Review and Heritage Policy Context

- 8.3 The main issue to consider is the heritage impact of the development, and this has been of particular interest to third parties and consultees including Historic England. It should be noted, in the first instance, that this report relates to this application for listed building consent, but that it should be read alongside the report covering the tandem Planning Application (ref. DC/20/0653/FUL) in order to fully appraise all heritage matters.
- 8.4 The Post Office building is listed as Grade II. During consideration of this application, Historic England conducted a listing review of the Post Office site. On the advice of Historic England, the Secretary of State for Digital, Culture, Media and Sport (DCMS) decided to amend the entry for the Former Post Office on the List of Buildings of Special Architectural or Historic Interest. The main (front) Post Office building remains listed at Grade II. However, all structures/buildings to the rear are specifically excluded and therefore not listed (and not subject of this listed building consent application). The extent of listing is also clarified in the updated map published alongside the list description.
- 8.5 Further to the formal amendment to the list entry it was confirmed by Historic England's Senior Listing Adviser (East) that:
- "the Local Authority may consider the rear additions to the Post Office to be in the curtilage but if they are specifically excluded from the listing using ERRA (which they are) then they cannot be curtilage listed."*
- 8.6 The Grade II Listed Post Office building is a designated heritage asset. The starting point for heritage considerations is the statutory duties under the Planning (Listed Buildings and Conservation Areas) Act 1990 ("The Act").
- 8.7 For listed buildings, s.66 of The Act imposes a duty to have special regard to the desirability of preserving listed buildings or their settings or any features of special architectural or historic interest which they possess. The duty is engaged when the local planning authority is considering whether to approve development which affects a listed building or its setting.
- 8.8 For Conservation Areas, the statutory duty under s.72 of The Act is to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area.
- 8.9 These statutory duties are reflected in national and local planning policy. The NPPF identifies conservation and enhancement of the historic environment as an important element of sustainable development. Paragraph 184 of the NPPF makes clear that heritage assets are *"an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations."*
- 8.10 Paragraph 189 says that when determining planning 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."*

- 8.11 NPPF paragraph 192 sets out that, *"in determining planning applications, local planning authorities should take account of:*
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
 - c) the desirability of new development making a positive contribution to local character and distinctiveness."*
- 8.12 The NPPF at paragraphs 193 and 194 requires planning authorities to place 'great weight' on the conservation of designated heritage assets, and states that the more important the asset the greater the weight should be. It also recognises that significance can be harmed by development within the setting of an asset. It is also clear that *"any harm or loss should require clear and convincing justification."*
- 8.13 The NPPF at paragraph 195 sets out that where a proposed development would lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or four other criteria are satisfied (which relate to the absence of reasonable or viable uses of the asset).
- 8.14 The statutory duties of The Act, and heritage objectives of the NPPF, are also reflected in the Historic Environment section of the Local Plan - policies WLP8.37 (Historic Environment); and WLP8.39 (Conservation Areas).
- 8.15 Members should understand that, in determining the applications, properly applying the relevant paragraphs of the NPPF and the historic environment policies of the Local Plan means that the statutory duties of The Act will have been complied with in respect of designated heritage assets.
- 8.16 Historic England (HE) originally objected to the proposal on a number of grounds. The applicant sought to respond to those comments and has engaged with officers and HE to address those concerns through the submission of additional information. A key submission is the Implementation Plan, that demonstrates the applicant's whole-building-approach, with restoration/re-purposing to be undertaken in phases; the current applications form the critical first phase in respect of ground floor remediation and restorative works; cleaning of the building façade; replacement of front windows; new single storey rear extension; and internal works to facilitate the commercial use of the ground floor space. HE supports the ethos of the implementation plan and recommend that a number of matters be addressed via suitably worded planning condition. HE did, however, continue to raise concerns regarding the form of the proposed rear extension and the applicant has sought to address that concern with the amended plans received 27 November 2020.

Assessment of the Proposed Development

- 8.17 The works subject of this application relate solely to the Grade II Listed Post Office, with development to the rear being subject of the tandem planning application.

8.18 This assessment covers the proposal in four sections:

- Works to the Frontage
- Rear Extension
- Internal Works
- Repair to Windows

Works to the Frontage

- 8.19 The proposal includes the replacement of aluminium windows in the front elevation with plate glass metal framed units reflecting the sash pattern above. The existing ramp and plinth are to remain as existing. The clear requirements of The Act and NPPF is for development to not cause harm to the significance of designated heritage assets. The proposal is window replacements that would preserve the significance of the Listed Building and its contribution to the Conservation Area in accordance with the statutory duties of s.66 and s.72 of The Act, along with the heritage objectives of the NPPF and Local Plan. The precise detail of the replacements would need to be covered by planning condition.
- 8.20 The existing timber door is to be retained, and the existing door openings are to be replaced with plate glass fixed units (aluminium framed). A new fire door and upper glazed transom section to the Street is also proposed. Conditions will be required to deal with the detail but, in principle, these works will cause no harm to the significance of the Listed Building.
- 8.21 Initially, the application proposed to clean only the ground level of the stonework façade; in response to comments from HE, the applicant has agreed to clean the entirety of the façade, which will significantly improve the appearance of the principal elevation in the High Street. The method of cleaning would need to be secured by planning condition.

Rear Extension

- 8.22 There is also the proposed extension to the rear of the Post Office which is single storey in form – originally shown to be a flat roof behind a pitched roof section – but amended to be a flat roof form. HE note that the demolition of the existing single storey pitched roof element would be an enhancement. HE has, in their final comments, expressed reservations about the parapet detailing of the proposed rear extension. In the view of officers, the proposed extension will cause no harm to the significance of the listed Post Office. It has a simple roof form and will be a significant improvement over the existing rear element. One's view of the rear extension will primarily be from the housing development and also the external area to the rear of the extension. In those views (and from the Conservation Area) the appearance will be of a simple flat-roofed extension, sitting comfortably with the listed building.
- 8.23 The Implementation Plan highlights the Oriel Window to the rear wall and seeks to 'Establish a plan to enhance and celebrate this historic feature'. This ethos fed into the amended proposals, which shows how this oriel window (supervisor's booth) can be retained internally and presented in the rear extension. This will better reveal an existing historic feature and is a benefit of the proposal. The amended extension design is considered to address key concerns raised by Historic England and be a policy-compliant design approach.

Internal Works

- 8.24 In order to create a lettable space a number of walls and internal walls are proposed to be removed. This, in principle, is acceptable.
- 8.25 HE has recommended that a planning condition secure a specification of works for the restoration of the interior cornice in the former banking hall. The applicant has agreed to this and such a condition will ensure this important historic feature is restored and presented in the re-purposed ground floor.
- 8.26 There is a note on the drawing stating that the windows are to be blocked up between units. This is acceptable in principle but needs to be covered by planning condition to ensure it is done in a reversible way if possible.
- 8.27 As part of the associated planning permission (if consented) the toilet block attached to the side wing is proposed for demolition. To ensure the resulting new exposed external wall is finished to a high standard, this needs to be covered by planning condition.

Repairs to all Windows

- 8.28 This work is welcomed. No details have been supplied but providing these are carried out like-for-like in all respects of material, quality of workmanship, and finish (and not over 50% of the window is replaced in this process) this works is considered to be a repair not requiring consent. This will be a positive for the significance of the Listed Building and its long-term conservation.

9. Conclusion

- 9.1 The works to the frontage of the Post Office will cause no harm, thereby preserving the significance of the Listed Building and its contribution to the conservation area.
- 9.2 The extension to the rear will replace a poor-quality extension and cause no harm to the significance of the Post Office. Some of the internal alterations to create a more open commercial space may cause some limited harm to historic fabric, but this work will make the ground floor space more viable and attractive to a commercial tenant – a public benefit far outweighing any limited harm arising. Detailed matters can be dealt with by planning conditions attached to any grant of consent but, in principle, the works proposed within this application are considered acceptable and would meet the requirements of policies WLP8.29 (Design), WLP8.37 (Historic Environment), WLP8.39 (Conservation Areas); and the Historic Environment objectives of the NPPF.

10. Recommendation

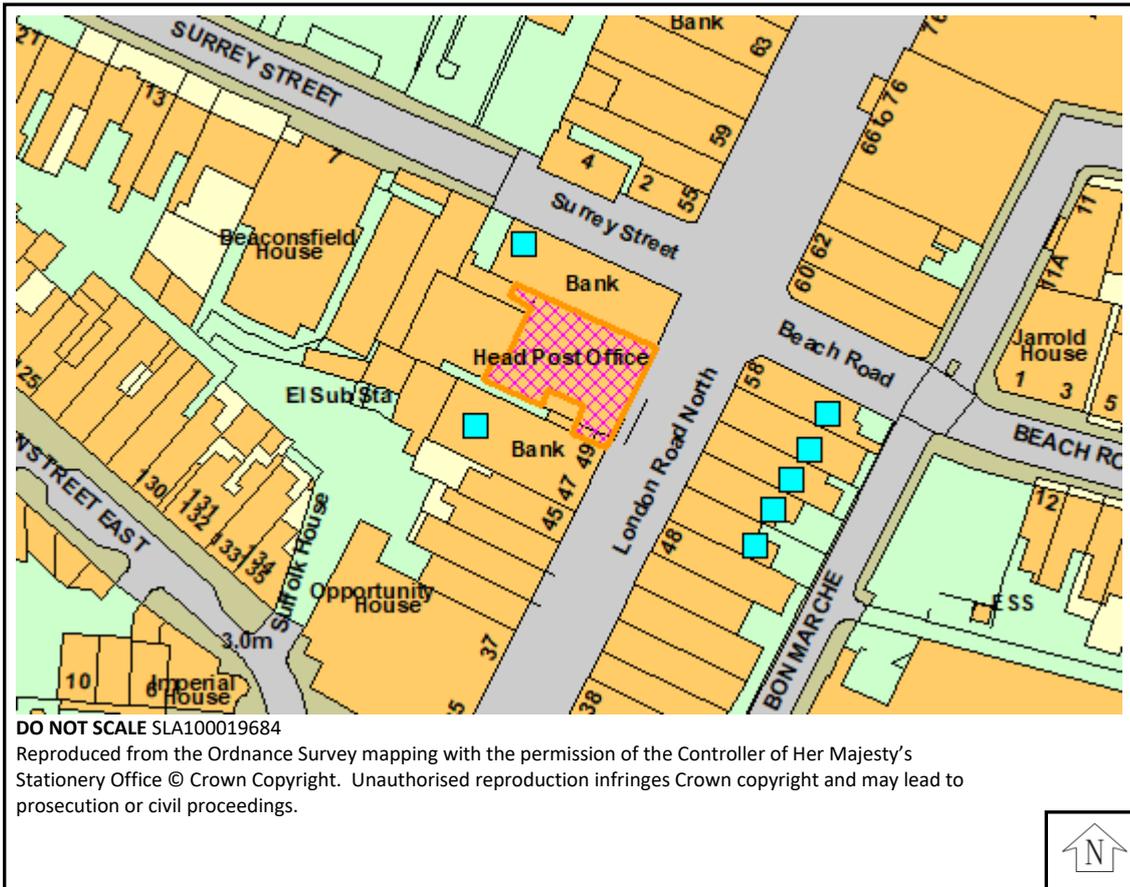
- 10.1 APPROVE subject to conditions including, but not limited to, those summarised below:
- 1) Three-year time limit.
 - 2) Standard plans compliance.

- 3) Large scale details of material, detailing and finish of windows and doors including large scale sections of the various elements.
- 4) Method statement of stonework cleaning to façade.
- 5) Details of works of making good to the side wing (adjacent the toilet block to be demolished in the tandem planning application).
- 6) Details of materials and finishes to the new extension.
- 7) Details of how any existing doors and windows of historic interest impacted by the extension are to be dealt with (retained or sealed up works).
- 8) Details of works to the decorative ceiling/cornice in the public hall.

Background papers

See application reference DC/20/1783/LBC at <https://publicaccess.eastsuffolk.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=QABQQNQXJJQ00>

Map



Key

-  Notified, no comments received
-  Objection
-  Representation
-  Support