



Committee Report

Planning Committee North – 12 January 2021

Application no DC/20/0653/FUL

Location

Post Office
51 London Road North
Lowestoft
Suffolk
NR32 1AA

Expiry date 9 April 2020 (Extended to 15 January 2021)

Application type Full Application

Applicant East Suffolk Council

Parish Lowestoft

Proposal 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.

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1. Summary

- 1.1 The application seeks planning permission for the re-development of the 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, unfortunately, 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: 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.

- 1.3 The ground floor of the Post Office returning to a commercial use is a highly significant public benefit and will play an important role in enhancing the vitality and viability of the high street. The new housing development to the rear brings its own public benefits in the form of nine affordable homes, and residents will spend in the local economy, supporting shops and services. The proposal would also utilise a suitable brownfield site for housing, which the NPPF directs should be given substantial weight in the balance. The high-quality contemporary design of the new housing responds to feedback from consultees and officers, and is considered to be a positive in terms of regeneration.
- 1.4 The loss of two non-designated heritage assets to the rear is unfortunate, and that resultant harm to the significance of the Listed Building and Conservation Area will need to be given great weight in the balance. However, there are positive elements of demolition that will remove harmful structures/buildings and better reveal the significance of the Post Office in the Conservation Area. The works of extension and alteration will cause no harm to the significance of the Listed Building, and all form part of a proposal to create a ground floor space that can be quickly brought back into a commercial use. The applicant's long-term implementation plan sets out a whole-building-approach, with this proposal representing a critical first phase of that restoration.
- 1.5 This proposal delivers significant public benefits in the form of (inter alia) affordable housing; bringing a Listed Building back into a viable use; and regeneration of an important town centre site, and the planning balance strongly indicates in favour of the scheme that accords with the Local Plan and NPPF as a sustainable form of development.

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 The site has the following planning history:
 - DC/81/1000/FUL - renewal of canopy to loading bay - permitted.
 - DC/90/0647/FUL - disabled persons ramp access - permitted.

- 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.
- DC/12/0027/FUL - replace defective sorting hall roof with new felt covering and general repairs and improvements - permitted.
- DC/14/0799/FUL & DC/14/0800/LBC - removal of external stamp vending machine and formation of two internal rooms - 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 proposed development relates to both the Post Office building and its associated land to the rear. Additional works to the Post Office building are detailed within the tandem Listed Building Consent (LBC) application (ref. DC/20/1783/LBC), but the elements covered by this planning application are detailed below. The original scheme has been subject of considerable revision, culminating in amended plans/drawings submitted for formal consultation on 27 November 2020.

3.2 Works to the Post Office building:

- A single storey rear extension to the Post Office.
- Alterations to the frontage – replacement windows and doors.

3.3 Development to the rear:

- Demolition of all (unlisted) adjoining structures and buildings to the rear of the Post Office.
- Development of nine affordable homes comprising a block of four (2-bedroom) flats; and five (3-bedroom) townhouses.
- Associated hard and soft landscaping works.

3.4 The proposal centres around bringing the Post Office back into a commercial use. In conjunction with the tandem LBC application, the scheme would create a 'white box' space at ground floor so that it is ready for a commercial operator. The works include repairs and upgrades to the ground floor area, and then the works to the frontage outlined above. The single storey extension would combine with the existing floorspace to create a commercial unit of some 225 square metres.

3.5 In response to comments from Historic England, the applicant has provided a long-term implementation plan to demonstrate the phased approach to bringing the whole building back into a commercial use, with the ground floor proposals subject of this application the first phase of that whole-building-approach.

3.6 The development to the rear involves demolishing all the non-listed structures and buildings to facilitate the development of an apartment block and five townhouses. The Design and

Access Statement submitted shows the various iterations tested at pre-planning stage, with the final layout positioning the townhouses in a staggered form, on a broadly east-west orientation, and the apartment block on the northern frontage onto Surrey Street. Access to the site would be via Surrey Street into a hard-landscaped courtyard area with 5no. parking spaces provided (to serve the townhouses). Secure storage for 18no. cycles would be provided, and bin storage areas located within the lower ground floors of the buildings. Due to flood risk, the floor levels of the accommodation are 1.2 metres above ground level. An area adjacent the access is designated for bin presentation on collection day. A separate pedestrian access from Surrey Street would run past the apartment block and provide commercial access to the Post Office.

- 3.7 In terms of the new buildings, the proposed apartment block is a four-and-a-half-storey brick building. It is a contemporary design approach, but utilising buff/gault brick to relate to the historic buildings adjacent. This element of the scheme has been subject of detailed positive discussion with officers and Historic England, in order to refine the design of this key new build element.
- 3.8 The flat roof form has been amended to a Zinc covered pitched roof. The proposed staircase windows use perforated brick to cover the openings to add interest and to minimise light overspill from these areas. The bay windows increase in size as they go up the building. The ground floor is proposed to utilise rusticated brickwork to add further interest and to better relate it to the ground floor forward projecting extension of the neighbouring building. A stepped-back section of the front wall has been designed to break up the massing of the façade and improve the relationship of the apartment block to Surrey Street.
- 3.9 The townhouses are three-and-a-half storeys in height, again constructed of brick but with dual-pitched roofs. The entrance hallways would be accessed off raised podiums via external stairs, with void space at lower ground level; this is to raise floor levels in the interest of flood risk mitigation.

4. Consultations/comments

Response to Original Scheme and First Round of Consultation

- 4.1 Five letters of Objection from local residents have been received that raise the following key material planning considerations (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 Suffolk Preservation Society has submitted a letter of Objection to the proposals on heritage grounds, raising concerns over the new build elements within the conservation area and setting of the listed Post Office.

Response to Amended Scheme and Second Round of Consultation

4.3 No further third-party representations have been received.

5. Consultees

Town Council

Consultee	Date consulted	Date reply received
Lowestoft Town Council	19 February 2020	11 March 2020
<p>Summary of comments:</p> <p><i>The Planning and Environment Committee of Lowestoft Town Council considered this application at a meeting on 10 March 2020. It was agreed to recommend approval of the application as the development provided additional housing within a location which could help to populate the town centre. This recommendation is supported by the emerging Lowestoft Neighbourhood Development Plan and Policy WLP8.19 of the Waveney Local Plan which look to support the vitality and viability of the town centre. Public comments regarding the adequacy of on-site parking places were noted, along with the comments from the Highways Authority, however it was agreed there was suitable alternative car parking in the area and alternative transport methods could also be considered.</i></p> <p>Planning Officer Note: See final LTC comments received 18 December 2020.</p>		

Consultee	Date consulted	Date reply received
Lowestoft Town Council	20 May 2020	10 June 2020
<p>Summary of comments:</p> <p><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	24 March 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
Historic England	18 March 2020	18 March 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
National Amenity Societies	18 March 2020	8 April 2020
Summary of comments: Council for British Archaeology object to the application on heritage grounds.		

Consultee	Date consulted	Date reply received
Environment Agency - Drainage	18 March 2020	No response
Summary of comments: No comments received.		

Consultee	Date consulted	Date reply received
Historic England	20 May 2020	9 June 2020
Summary of comments: See final comments dated 15 December 2020.		

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

Summary of comments:
Council for British Archaeology object to the application on heritage grounds.

Consultee	Date consulted	Date reply received
Environment Agency - Drainage	20 May 2020	No response

Summary of comments:
No comments received.

Consultee	Date consulted	Date reply received
Suffolk County - Highways Department	20 May 2020	4 June 2020

Summary of comments:
Object due to the lack of parking provision.

Consultee	Date consulted	Date reply received
Suffolk County - Highways Department	19 February 2020	5 March 2020

Summary of comments:
Refuse - insufficient parking provided.

Non statutory consultees

Consultee	Date consulted	Date reply received
Lowestoft Civic Society	20 May 2020	23 March 2020

Summary of comments:
Raise concerns with the proposal and request further information on the heritage impact of the development.

Consultee	Date consulted	Date reply received
Ecology (Internal)	20 May 2020	30 March 2020

Summary of comments:
No objections. Conditions recommended.

Consultee	Date consulted	Date reply received
Lowestoft Civic Society	20 May 2020	No response

Summary of comments:

No further comments received.

Consultee	Date consulted	Date reply received
Ecology (Internal)	20 May 2020	No response
Summary of comments: See comments received 30 March 2020.		

Consultee	Date consulted	Date reply received
Design And Conservation (Internal)	20 May 2020	No response
Summary of comments: Internal planning consultee; see report for design and heritage considerations.		

Consultee	Date consulted	Date reply received
Environmental Protection (Internal)	20 May 2020	No response
Summary of comments: See comments received 10 March 2020.		

Consultee	Date consulted	Date reply received
Essex And Suffolk Water PLC	20 May 2020	No response
Summary of comments: No comments received.		

Consultee	Date consulted	Date reply received
Waveney Norse - Property And Facilities	20 May 2020	No response
Summary of comments: No comments received.		

Consultee	Date consulted	Date reply received
Design And Conservation (Internal)	19 February 2020	16 March 2020
Summary of comments: Internal planning consultee; see report for design and heritage considerations.		

Consultee	Date consulted	Date reply received
Environmental Protection (Internal)	19 February 2020	10 March 2020
Summary of comments: No objection subject to conditions.		

Consultee	Date consulted	Date reply received
Essex And Suffolk Water PLC	19 February 2020	No response
Summary of comments: No comments received.		

Consultee	Date consulted	Date reply received
Waveney Norse - Property And Facilities	19 February 2020	No response
Summary of comments: No comments received.		

Consultee	Date consulted	Date reply received
East Suffolk Council Economic Development and Regeneration		29 June 2020

Summary of comments:
"The restoration and regeneration of Lowestoft Post Office is a key anchor project to kick-start and drive forward regeneration within Lowestoft Town Centre. The project will revitalise and repurpose a focal, vacant redundant building within the main shopping area of London Road North, bringing significant benefits to the wider Town Centre, increasing footfall through the commercial offer at the front and providing affordable residential housing to the rear.

The Post Office is highlighted within the emerging Lowestoft Town Centre Masterplan, which underlines the importance of its restoration as a heritage asset but also as a driver for the overall regeneration of the site. The restoration and regeneration of the site is also a key, strategic project within the newly confirmed Lowestoft South High Street Heritage Action Zone (HSHAZ). The HSHAZ aims to regenerate the high street, using the conservation of heritage buildings as a key driver for change. The programme seeks to bring the community closer to heritage and in turn finding new and creative uses for our changing high streets. The HSHAZ Programme is a national scheme being led by Historic England and funded by central government (DCMS). This scheme provides both external funding and conservation expertise to the town centre, providing grant funding for heritage buildings, which include a significant grant for the Post Office restoration. The Post Office restoration is seen as a key driver for change within the town centre, which sends a strong message to other property owners within the area to invest/ uplift in their buildings and will be seen an

example of how East Suffolk Council is leading by example to regenerate the town centre.”

Re-consultation consultees

Consultee	Date consulted	Date reply received
Lowestoft Town Council	30 November 2020	18 December 2020
<p>Summary of comments:</p> <p><i>“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.</i></p> <p><i>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.”</i></p>		

Consultee	Date consulted	Date reply received
Historic England	30 November 2020	15 December 2020
<p><i>“Historic England Advice</i></p> <p><i>Historic England have given advice in our previous comments relating to the demolition of the non designated gault brick building to the rear of the old post office. We have been consistent in our view that this building makes a positive contribution to the character of the conservation area, and due to the architectural links between it and the main post office, we consider there to of been a strong date link between the two buildings. It is highly likely that documents relating to this building are present in the postal museum archives. We consider that the gault brick building is able to be retained and reused in line with our previous comments, but it is for the local planning authority to carry out an assessment of the planning balance as defined in paragraph 196 of the NPPF.</i></p> <p><i>Should your local authority be convinced of the planning balance in favour of demolition of the existing gault brick building, we would offer the following comments in relation to the proposed scheme.</i></p> <p><i>The scheme proposes a brick building turning its longer elevation towards the road and gable ends towards the post office and the neighbouring residential buildings. The staircase windows use perforated brick to cover the openings to add interest and to minimise light overspill from these areas. The bay windows increase in size as they go up the building and are a modern take on the traditional bay windows found elsewhere within Lowestoft. The ground floor is proposed to utilise rusticated brickwork to add further interest and to better relate it to the ground floor forward projecting extension of the neighbouring building. This gives the proposal a horizontal emphasis drawing the eye along, rather than up the structure.</i></p>		

The proposed scheme would have less of a blocky appearance than the previous design and due to the pitched roof, it would be less dominant at higher levels. The contrasting colours and detailing in the brickwork would add interest to the elevations but these would need to be considered carefully so as not to become dominating or confusing in themselves. Close attention should be paid to materials, in particular the bricks and the pointing as this would be key to the success of the elevations and therefore to the success of the overall scheme.

We would suggest that conditions are considered relating to samples of external materials, large scale detail of fenestration and a recording condition for the gault brick building and the interior details which results in the record being submitted to the Suffolk HER.

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
Suffolk County - Highways Department	30 November 2020	04 December 2020
Summary of comments: Object due to the lack of parking provision.		

Consultee	Date consulted	Date reply received
Environment Agency	30 November 2020	17 December 2020
Summary of comments: No objections. Advice given on how to consider flood risk.		

Consultee	Date consulted	Date reply received
Environmental Protection (Internal)	19 February 2020	10 March 2020
Summary of comments: Conditions recommended for ground contamination and construction method statement. Noise assessment required prior to determination.		

6. Publicity

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

Category	Published	Expiry	Publication
Conservation Area	27 March 2020	21 April 2020	Lowestoft Journal

Category Conservation Area	Published 27 March 2020	Expiry 21 April 2020	Publication Beccles and Bungay Journal
Category Conservation Area	Published 28 February 2020	Expiry 20 March 2020	Publication Lowestoft Journal
Category Conservation Area	Published 28 February 2020	Expiry 20 March 2020	Publication Beccles and Bungay Journal

7. Site notices

General Site Notice
Reason for site notice: Conservation Area; Listed Building
Date posted: 20 March 2020
Expiry date: 14 April 2020

General Site Notice
Reason for site notice: Conservation Area; Affects Setting of
Listed Building
Date posted: 25 February 2020
Expiry date: 17 March 2020

8. Planning policy

National Planning Policy Framework (2019) (NPPF)

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

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

WLP8.1 - Housing Mix (East Suffolk Council - Waveney Local Plan (March 2019))

WLP8.2 - Affordable Housing (East Suffolk Council - Waveney Local Plan (March 2019))

WLP8.18 – New Town Centre 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))

WLP8.21 – Sustainable Transport (East Suffolk Council - Waveney Local Plan (March 2019))

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

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

WLP8.32 – Housing Density and Design (East Suffolk Council - Waveney Local Plan (March 2019))

WLP8.33 – Residential Gardens and Urban Infilling (East Suffolk Council - Waveney Local Plan (March 2019)

WLP8.34 – Bio Geodiversity (East Suffolk Council - Waveney Local Plan (March 2019)

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

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

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

9. Planning considerations

Policy Background

- 9.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) sets out 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 12 of the NPPF which affirms the statutory status of the development plan as the starting point for decision-making.
- 9.2 The development plan comprises the East Suffolk Council - Waveney Local Plan (“The Local Plan”) and any adopted Neighbourhood Plans. The relevant policies of the Local Plan are listed in the section above and will be considered in the assessment to follow. It is important to also note that NPPF paragraph 11 requires that planning decisions apply a presumption in favour of sustainable development and that means, for decision-taking, approving 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 the Local Plan. Local Plan spatial strategy policies WLP1.1 and WLP1.2 set out, broadly, that new development should generally be directed to within the defined settlement boundaries, with the majority of development over the plan period allocated to Lowestoft as the largest town in the District. The principle of residential development, in that context, is entirely supported by the Local Plan.

Vitality and Viability of Lowestoft Town Centre

- 9.4 Across the UK there is a national trend of town centre decline. In 2019, the Ministry for Housing, Communities and Local Government (MHCLG) published its report ‘High Streets and Town Centres in 2030’, with a key conclusion being that *“High streets and town centres need urgently to adapt, transform and find a new focus in order to survive”* (paragraph 17). Part of that adaptation and transformation, is for high streets and town centres to look beyond the typical model of predominantly retail – and that a variety of uses must combine with housing to create a sense of place, rather than areas based on just financial transactions.

- 9.5 Lowestoft is unfortunately 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, the town has seen the loss of additional retailers including Beales Department Store, Claire's Accessories, Body Shop, Coes, Kerry's etc. and this reflects the decline seen both empirically in terms of the high vacancy rates, but also anecdotally from a walk along the High Street in the context of the application site. 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.
- 9.6 Local Plan policies WLP8.18 and WLP8.19 work together and seek to enhance the vitality and viability of town centres. A key part of that is to clearly define the town centre boundary and the shopping areas within those centres. The policy approach of WLP8.18 is to ensure that retail, leisure, offices, tourism, cultural and community uses are directed to the town centre, wherever possible, and that out-of-town developments for such uses are exceptional, and properly justified. WLP8.19 focuses on the primary and secondary shopping frontages, setting out a strategy to protect ground floor premises to ensure they remain in retail or café and restaurant uses.
- 9.7 Chapter 7 of the NPPF is concerned with ensuring the vitality of town centres, and sets out that Local Planning Authorities should (inter alia):
- “define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters” (paragraph 85a)
 - “recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.” (paragraph 85f)
 - “Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.” (paragraph 87)
- 9.8 The Post Office building is within a 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. A key element of the proposed re-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.

- 9.9 Whilst there are detailed elements of the physical works involved to the listed building (to be considered later in this report and in the tandem LBC application) 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 potential positive impact of this focal point building returning to a commercial use cannot be underestimated, in terms of enhancement of the vitality of the area. This weighs heavily in favour of the scheme.
- 9.10 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.
- 9.11 It then turns to whether the ground floor proposals would represent a piecemeal approach that prejudices a viable future use for the upper floors. The ground floor has historically been in a commercial, public-facing use and therefore that returning can only be supported. The main issue is whether the ground floor use, and proposed internal layout, would compromise access to the upper floors. In this instance, the proposal retains the existing stairwell/fire escape to the north-western side of the ground floor, and access could be achieved to that from Surrey Street via a walkway past the new apartment building. There is nothing inherent in the ground floor proposals that would prejudice future uses of the upper floors. In any case, works that impact the fabric of the listed Post Office building will need Listed Building Consent, and potentially new uses of the upper floors may need Planning Permission also, ensuring that the Local Planning Authority will be able to control that when more detailed proposals for the upper floors come forward.
- 9.12 In response to comments from Historic England, the applicant has sought to positively address the whole building with a long-term (phased) implementation plan, which sets out the following key points (amongst other things):

“The masterplan sets out the vision for the longer-term plans however based on the evidence of the market viability report by Aspinall Verdi there is an need to carry out the repurposing of the Post Offices in phases. The first phase will carry out works that will prevent further deterioration and restore the properties features, with a focus on the frontage and key internal features. We will look to work with conservation officers and Historic England to ensure the opportunities are maximised to restore the front building. A key part of the first phase will upgrade the ground floor of the building to provide an immediate meanwhile space. The building will be used to promote the work of the South HS HAZ as well as the wider ESC regeneration programme. As the space will be safe to use it provides the opportunity for us to provide a range for short term pop up uses: workshop space, pop in exhibition space, promotion space. We will use this phase to look at more permanent meanwhile uses such a pop-up uses such as pop-up cafes or work space. As part of our Town Investment Plan work we have engaged the services of a creative sector consultant who is providing an analysis of the creative sector in and around Lowestoft to establish what the demand is for creative work space in Lowestoft. We are aware of a number of vacant buildings within the town centre and that these cannot all be set all up as “creative workshop spaces”. Therefore this piece of analysis will identify the demand and establish which of ESC owned empty buildings may provide the greatest opportunity. The Post Office will be one of those spaces considered. This feasibility work may provide the evidence for a

more permanent meanwhile space for the post office for the creative sector. For town centre revitalisation it is key for us to show that this building is open and being used in order to keep momentum for the other businesses around it.

The second phase of the project will carry out further feasibility works for the upper floor to investigate in more detail potential uses and works required to enable those uses. The second phase will carry out works, similar to those in the first phase, to enable the upper floor to have meanwhile use. The second phase will conclude with having identified and implemented a permanent solution to both the ground and upper floors.”

9.13 Historic England support the ethos of the Implementation Plan, addressing a key part of their initial concerns with the proposals. The applicant has clearly demonstrated a positive intent for the whole Post Office Building, and this application represents an important first step to bringing the entire building back into a long-term, viable use.

9.14 Moving on to development to the rear of the Post Office building, the key element of the proposals is the erection of nine dwellings. Part of the policy background to town centres – particularly in the NPPF as referenced earlier in this section – is for planning decisions and policies to facilitate a diverse mix of uses in these locations, including housing. This can be seen in the Government’s approach to permitted development rights which has seen many offices convert to residential uses in urban locations. The creation of nine dwellings in this location is a positive for the vitality of the area. The regeneration itself may be perceived locally as making the area more attractive, but more significantly, residents of the new dwellings will contribute to high street footfall and likely spend at local shops and services. Whilst there are detailed matters to consider regarding the housing element of the proposal, the principle of residential development on the site is supported as a highly significant contribution to the vitality and viability of the high street in accordance with the Local Plan and NPPF.

Affordable Housing and Housing Mix

9.15 Recent data suggests that there are some 3,970 people on the Housing Register for East Suffolk. Of those registered, some 869 people claim a local connection to Lowestoft and of those, 330 applicants are in Housing Need. Of those 330 applicants, the size of property they require is as follows:

- 1 bedroom – 163
- 2 bedroom – 102
- 3 bedroom – 40
- 4 bedroom – 21
- 5 bedroom – 4

9.16 The proposal is for nine dwellings, of which all would be affordable homes. The proposed housing mix is tabled below:

Dwelling Type	No. of Bedrooms	Tenure	Number of Dwellings
Flats/apartments	2-bed	Affordable housing	4 No.
Houses	3-bed	Affordable housing	5 No.
			TOTAL = 9 No.

- 9.17 As the site is owned by East Suffolk Council, it will be Council housing stock. In any case, a S106 legal agreement will be required to secure the accommodation as affordable housing in perpetuity, and a planning condition is recommended to secure that S106 legal agreement prior to the commencement of any development. The precise tenure would need to be agreed through the S106 in consultation with the Housing Team so as to reflect the identified local need.
- 9.18 The proposed development relates to an area where there is a very high need for affordable housing, and the contribution of nine affordable homes to help meet that need is a public benefit that should be given great weight in the balance. The provision of affordable housing, and mix of property type and size, meets the objectives of Local Plan policies WLP8.1 and WLP8.2.

Heritage Considerations and Design of Development

- 9.19 A 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 planning permission, but that it should be read alongside the report covering the tandem Listed Building Consent application (ref. DC/20/1783/LBC) in order to fully appraise all heritage matters relevant to this re-development proposal.
- 9.20 The whole site falls within the South Lowestoft Conservation Area, and 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. The extent of listing is also clarified in the updated map published alongside the list description.
- 9.21 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 ERRAs (which they are) then they cannot be curtilage listed."*
- 9.22 The South Lowestoft Conservation Area and the Grade II Listed Post Office building are designated heritage assets. The starting point for heritage considerations is the statutory duties under the Planning (Listed Buildings and Conservation Areas) Act 1990 ("The Act").
- 9.23 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.
- 9.24 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.

- 9.25 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.”*
- 9.26 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.”*
- 9.27 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.”*
- 9.28 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.”*
- 9.29 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).
- 9.30 NPPF paragraph 196 sets out that:
- “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”*
- 9.31 In the case of non-designated heritage assets (NDHAs), paragraph 197 of the NPPF says that the effect of a proposed development on their significance should be taken into account, and that where a development would affect a non-designated heritage asset either directly or non-directly, *“a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”.*

- 9.32 The NPPF at Paragraph 200 highlights the opportunity for local planning authorities to look for new development within the setting of heritage assets that will enhance or better reveal their significance. Proposals that therefore preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.
- 9.33 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); WLP8.38 (Non-Designated Heritage Assets); and WLP8.39 (Conservation Areas).
- 9.34 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.
- 9.35 Although not listed (or curtilage listed) the two (connected) structures to the rear of the building - the sorting office and the three storey building - are still of historic significance to due to their related use and the fact that they demonstrate the evolution of the Post Office Service over time and the contribution they make to the street scape.
- 9.36 The ancillary buildings appear to have always been used for their original use in the day-to-day operation of the post office and, altogether, they had a functional relationship with the Listed building as a group. The historic significance of these structures varies. The rear architecturally utilitarian compared to that of the public facing facade and decorative main banking hall. These buildings provided the back-room function of the post office until 1970 and give an understanding of how the site functioned as a whole. The sorting office and the three-storey building are of some historic significance. They are examples of ancillary buildings to a main Post Office and represent the development/expansion of the service over 50 years (circa 1880 – 1930).
- 9.37 The sorting office and the three-storey building are constructed in quality white gault bricks externally with hardwearing and sanitary glazed bricks to the internal surfaces. They have a utilitarian character which reflects the era in which they were built, and the investment made to create long lasting, solid structures.
- 9.38 Officers have considered whether the sorting office and the three-storey building are ‘Non-Designated Heritage Assets’ (NDHAs) against the criteria set out in the Local plan and the buildings meet the following three:

Architectural interest

- Integrity - the building or structure will retain a degree of intactness and lack of harmful external alteration and, if part of a group, will make a contribution to the surviving completeness of that group.
- Group value - the buildings or structures will have a coherent design or historic functional relationship as a group.

Historic interest

- Rarity - the building or structure must represent a design, use or other quality that was always uncommon or has now become uncommon or exceptional to the locality, district or wider region.

- 9.39 As two or more of the criteria have been met, these buildings are deemed to be NDHAs, and the impact of the development will therefore also need to be considered in the context of NPPF paragraph 197 and Local Plan WLP8.38.
- 9.40 Historic England initially objected to the proposal on a number of grounds, although the submission of further information and dialogue between the applicant, officers, and Historic England, has managed to address many of those concerns.
- 9.41 In terms of the main Post Office building, there are series of works proposed that would directly impact it (and therefore also subject of the tandem Listed Building Consent application).
- 9.42 There is then the setting of the Grade II Listed Post Office building, which the development to the rear is clearly an integral part of. As identified, two of the buildings to the rear are NDHAs and these buildings – along with the whole site – form part of the designated heritage asset that is the South Lowestoft Conservation Area (SLCA).
- 9.43 The significance of the sorting office and the three-storey buildings as NDHAs is identified earlier in this report, and it is clear from Historic England’s response to the application that they have consistently objected to the demolition and replacement of these buildings. However, in conducting the listing review in April of this year, Historic England’s assessment of the whole site, to inform that amended list entry, sets out that:

“Whilst the rear extensions demonstrate the process flow of the work of the Post Office, they have not survived in a form that readily demonstrates their function. The sorting office has been partitioned and any fixtures or fittings relating to its former use removed. The three-storey gault brick building, the most notable out of the rear extensions, has been similarly gutted internally, with only the staircase remaining. Its former use has not been discovered and there are no surviving internal fixtures or fittings to indicate its purpose. The covered yard and shed at the westernmost end of the site are both of standard form and construction, devoid of any architectural interest.”

- 9.44 On that basis, Historic England directed that all rear additions to the Post Office building should be excluded from the listing, which is very noteworthy. However, it is acknowledged that, for the reasons given earlier in this report, the three-storey building, and connected sorting office, have some historic significance and are therefore NDHAs.
- 9.45 Local Plan policy WLP8.38 relates to NDHAs and sets out that:

“Proposals for the re-use of buildings which are on the Local List of Non-Designated Heritage Assets or otherwise identified as a non-designated heritage asset will be supported if compatible with the elements of the fabric and setting of the building which contribute to its significance. New uses which result in substantial harm to a building or its setting will not be permitted unless all other options for the building have been exhausted.

Proposals which involve the demolition or part demolition of a building which is on the Local List of Non-Designated Heritage Assets or otherwise identified as a non-designated heritage asset will only be permitted where there are comprehensive and detailed plans for redevelopment of the site and where:

- *The building is structurally unsound and beyond feasible and viable repair (for reasons other than deliberate damage or neglect); or*
- *All measures to sustain the existing use or find an alternative use/user have been exhausted.”*

- 9.46 In line with WLP8.38, NPPF Paragraph 197 requires that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing the current application that directly affects two non-designated heritage assets, the Planning Committee will need to arrive at a balanced judgment having regard to the scale of any harm or loss and the significance of the asset. The two NDHA buildings are not of very great significance – they are not designated heritage assets. However, they meet three of the Council’s ten criteria for identification as NDHAs and are clearly of some local importance. It is officer’s judgment that their demolition would be a high level of harm but, taking into account the relatively low level of significance of these buildings, that harm should only be given moderate weight in the final planning balance, purely in terms of the loss of NDHAs. However, these buildings do contribute somewhat to the significance of the Listed Building (Post Office) and also the SLCA. They are examples of ancillary buildings to a main Post Office and represent the development/expansion of the service over 50 years (circa 1880 – 1930). That loss will result in some harm to the significance of these designated heritage assets; that level of harm is considered to be low-to-moderate (and ‘less than substantial’ in NPPF terms). On that basis, the test at NPPF paragraph 196 is duly engaged, and that harm identified will need to be given great weight in the balance and properly weighed against the public benefits of the proposal.
- 9.47 There is also further demolition proposed to the rear of the Post Office building. However, this is considered to be a positive. Removing the glass roofed rear lean-to extension to the rear of the Listed Building, the covered way attached to the three-storey element, and the concrete framed/corrugated cement roofed structure to the rear would represent an enhancement to the character of the Listed Post Office, as these elements are unsightly in the setting of the building and their removal will better reveal the significance of the Listed Building. This would all benefit the character and appearance of the conservation area. These positive elements of demolition will need to be considered in the balance, alongside the harmful elements of demolition.
- 9.48 Historic England have expressed concerns over the design of the development to the rear, and they would like to see the three-storey building retained and converted. The applicant has provided further information on this and why that is not feasible. It is understood that initial investigations including intrusive surveys and the preparation of a detailed specification of remedial works were carried out at the project outset to assess the possibility of retaining the three-storey building. Notwithstanding the reportedly poor condition of the internal floors, the design team explored the potential retention of this building as it was identified that the form and internal finishes could make for high quality accommodation.
- 9.49 However, the applicant advises that the position of the building on the site and its east/west orientation compromised the potential layout options for supporting new build units on the site. The Architects tested a number of layouts (as shown in the Design and Access Statement) but with access and overlooking constraints taken into consideration it was not possible to fit houses onto the site with the building retained. Options for extending the building to increase the potential number of flats on the site were reportedly discounted as

this high-density mix was not supported by local housing demand, nor did they match the Council's regeneration priorities for the site.

- 9.50 The applicant has also advised that the existing floor plans of the three-storey building dictated a limited number of units, likely to comprise one 1-bed flat and one 2-bed maisonette over supporting ancillary accommodation at ground floor, due to the flood risk to the site. The high-level repair cost plan produced identified that the cost of replacing the internal floors would outweigh the potential return on these low unit numbers. The applicant has also advised that building suffers from subsidence with the steel supports for the internal floors corroded. The picture painted regarding the state of the building, internally, does not conflict with Historic England's listing review conclusions that the three-storey building has been "gutted internally".
- 9.51 In addition to this information, the applicant has provided a Budget Estimate of the proposed structural repairs which indicates a very high cost to make the building a serviceable and sound structure. Accordingly, it is officer's professional opinion that there is not likely a feasible or viable re-use of the three-storey building, and thus the proposal to demolish and replace as part of a comprehensive development scheme is supported by policy WLP8.38.
- 9.52 Given that the second NDHA, the sorting room, is connected to the three-storey building, it also seems very unlikely that this could feasibly be retained/converted. In any case, its loss would need to be weighed up as part of the overall planning balance.
- 9.53 The works of demolition, alone, would clearly represent harm to the significance of the Listed Building and the Conservation Area because buildings that demonstrate the historic function of the Post Office would be lost, and also those buildings that positively contribute to the character and appearance of the Conservation Area would also be lost. However, the proposal is a comprehensive re-development and in making a balanced judgment regarding the demolition of NDHAs in the conservation area, the design quality of the replacement development is very important, because the statutory test under s.72 of The Act is that development should preserve or enhance the character and appearance of the conservation area. Then in terms of the setting of the Listed Building, the s.66 duty is 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.
- 9.54 The proposed development is considered to represent high quality design. It is a contemporary proposal that will add a point of contrast in the streetscene – particularly the Surrey Street Frontage which is currently quite unattractive and detracts from the character and appearance of the conservation area. The apartment block design is a bold contemporary form but takes its fenestration cues from the historic buildings adjacent. The window proportions and detailing break up the massing of this building. The townhouses are again a contemporary iteration of a local form – drawing on precedent of townhouses in London Road South and Kirkley Cliff Road. Whilst being a point of contrast to the surroundings in terms of contemporary form, the use of gault/buff brick will ensure a degree of relatability with the local context.
- 9.55 Historic England (HE) initially objected to the design of development to the rear of the Post Office, citing concerns over the scale of the new buildings in terms of their heights relative to the Post Office and adjacent Natwest building. This element of the scheme has been

subject of considerable revision and discussion with HE. Whilst continuing to object to the loss of the NDHA buildings, HE has advised further on the amended design of the apartment building:

“Should your local authority be convinced of the planning balance in favour of demolition of the existing gault brick building, we would offer the following comments in relation to the proposed scheme.

The scheme proposes a brick building turning its longer elevation towards the road and gable ends towards the post office and the neighbouring residential buildings. The staircase windows use perforated brick to cover the openings to add interest and to minimise light overspill from these areas. The bay windows increase in size as they go up the building and are a modern take on the traditional bay windows found elsewhere within Lowestoft. The ground floor is proposed to utilise rusticated brickwork to add further interest and to better relate it to the ground floor forward projecting extension of the neighbouring building. This gives the proposal a horizontal emphasis drawing the eye along, rather than up the structure.

The proposed scheme would have less of a blocky appearance than the previous design and due to the pitched roof, it would be less dominant at higher levels. The contrasting colours and detailing in the brickwork would add interest to the elevations but these would need to be considered carefully so as not to become dominating or confusing in themselves. Close attention should be paid to materials, in particular the bricks and the pointing as this would be key to the success of the elevations and therefore to the success of the overall scheme.”

- 9.56 Officers consider that the entire area to the rear of the Post Office is covered by structures and buildings (some of which are three storeys in height). The proposal would ‘free up’ more space to the rear of the site by aggregating accommodation into denser, taller blocks. One could reasonably make the argument that the greater sense of space to the rear of the Post Office building will better reveal its significance within the Conservation Area.
- 9.57 The contemporary apartment block will create positive street enclosure and active frontage to Surrey Street and is a good design approach in urban context, and it is seen by the enclosing presence of the Natwest building adjacent. It is noted that the new building would be much taller, but it is not clear that this would represent harmful enclosure to the street, particularly when it is a much more attractive design than the frontage of the building it would replace.
- 9.58 HE also has concerns with the three-storey pitched roof townhouses, which are said to give a ‘warehouse feel’ to the proposed row and form an obvious enclosure to the boundary of the site. In the first instance, it is not clear how an obvious boundary enclosure represents harm to the significance of the Conservation Area or adjacent listed buildings. Delineation of boundaries via built form is a typical and many-times replicated feature in urban locations; officers do not consider this to be harmful or out-of-character. The ‘warehouse feel’ is not necessarily agreed with as officers consider the design of the townhouses to be high-quality contemporary buildings well-related to their context. In any case, there is a historic pattern of commercial/industrial structures and buildings to the rear of the Post Office, so even if one were to say the buildings have that utilitarian ‘warehouse’ appearance, that could arguably be an appropriate design approach to draw on that historic form to the rear.

- 9.59 The main concern from HE relates to the loss of the NDHA buildings and then the scale of the replacement development. As set out above, officers accept the loss of the NDHA buildings because it is not viable to retain and convert them. In their final consultation response, HE rightly acknowledges that the demolition of these buildings is a matter that the Local Planning Authority needs to weigh in the balance. In terms of scale, there is a well-established precedent for three-storey development to the rear of the Post Office (the gault brick building and the rear wing of the listed building). Officers do not consider it harmful to have large buildings to the rear of the Post Office. This is an urban context where a mix of building size and type is common and expected. The proposal will also remove many unsightly and harmful structures/buildings, and the replacement buildings are of a high-quality design.
- 9.60 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 in the conservation area.
- 9.61 The proposal includes the replacement of aluminium windows in the front elevation with plate glass metal frame 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.
- 9.62 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 Listed Building or Conservation Area.

Conclusion on Design and Heritage Matters

- 9.63 There are clearly a number of issues to consider in respect of heritage and design which will need to be carefully weighed up in the final planning balance.
- 9.64 In the first instance, the loss of two NDHAs is unfortunate but is justified when they cannot realistically be retained/converted into a viable use. The loss of these NDHAs would cause a low-to-moderate level of harm to the significance of the grade II listed Post Office and the character and appearance of the conservation area. A balanced judgment will need to be made with regard to the loss of the NDHAs; and the harm to designated heritage assets will need to be given great weight and duly weighed against the public benefits of the proposal in accordance with NPPF paragraph 196.

- 9.65 The works of demolition includes positive removal of unsightly structures/buildings that detract from the significance of the Post Office and conservation area. The well-designed housing development will relate well to these designated heritage assets and better reveal the significance of the Post Office.
- 9.66 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.
- 9.67 The extension to the rear will replace a poor-quality extension and cause no further harm to the significance of the Post Office, and internally it will make the ground floor space more viable and attractive to a commercial tenant.
- 9.68 The design of development is considered by officers to be very good and meet the requirements of design policies WLP8.29 (Design), WLP8.32 (Housing Density and Design), and WLP8.33 (Residential Gardens and Urban Infilling).

Residential Amenity

- 9.69 Policy WLP8.29 (Design) seeks, amongst other things, to protect the amenity of the wider environment, neighbouring uses and provide a good standard of amenity for future occupiers.
- 9.70 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. It is noteworthy that no close neighbouring properties/tenants/residents have commented on the proposals.
- 9.71 The main consideration relates to the amenity of future occupiers of the development, given the constrained nature of the site in this urban location. It is accepted that the garden areas to the new townhouses are very small, but for a high street location, any outside space is considered to be a positive. A small garden is a trade-off of urban living that many would likely make, when so much is on the doorstep. The apartments would not have formal gardens, although the hard-landscaped courtyard could offer some limited ability to socialise outdoors with other residents. In any event, formal outside space would not be required for flats/apartments in an urban location.
- 9.72 The 2-bedroom flats/apartments would each have a spacious floor plan and good access to daylight/sunlight.
- 9.73 The Design and Access Statement explains the design rationale for the staggered plan form of the town houses, with plots 1 and 2 set farther back to allow west light into the courtyard area, and also reduce overlooking between the apartment block and the townhouses. That separation between the apartment block and plots 1 and 2 is considered acceptable in the context of a dense urban layout.
- 9.74 It is accepted that the dense layout means privacy levels for future occupiers would not be of the standard seen on a rural housing development. However, the design of the proposal has clearly been carefully thought through to maximise light levels to each home and ensure the best levels of privacy possible in the context. The provision of some outdoor space is

welcomed. The proposal is considered to provide an acceptable standard of amenity for future occupiers in accordance with the objectives of WLP8.29 (Design).

Highways Safety and Sustainable Transport

- 9.75 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 109 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.”

- 9.76 The site is located within the town centre, on the high street, and therefore in walking distance of shops and services to meet everyday needs. Public transport in the form of bus and rail is readily accessible. The development will provide secure cycle storage for 18 cycles (2 per residential unit), which will encourage the use of that transport mode. Five parking spaces would be provided for the five townhouses; no vehicle parking would be provided for the four flats.
- 9.77 The County Highways Authority has objected to the application on the grounds that there is a lack of parking provision; they would expect a minimum of nine spaces to be provided (1 per residential unit).
- 9.78 Whilst the concerns of the Highways Authority are noted, this is about as sustainable a location as can be found in East Suffolk. It is not unreasonable to assume residents moving to these properties would perhaps not own private vehicles, or not require one given all day-to-day needs can be met via other modes of transportation. In the vicinity of the application site parking is controlled, so the development proposal would not likely lead to unsafe parking on the highway. Officers consider that the proposal strikes the right balance between providing some vehicle parking, a good provision of secure cycle storage, and relying on the sustainable location of the site and good pedestrian and public transport links. The site access from Surrey Street already exists and, in any case, Surrey Street terminates just after the access – and becomes pedestrianised where it joins the High Street – so vehicle speeds in this location will be very low. Access to-and-from the site will be safe for all users.
- 9.79 Accordingly, there is no reason to refuse permission on highways grounds, and the proposal accords with the sustainable transport objectives of WLP8.21.

Flood Risk and Surface Water Drainage

- 9.80 The 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 1in100 and 1in1000 annual probability of fluvial flooding in any year. The Strategic Flood Risk Assessment for the Local Plan identifies that, with climate change accounted for, the site falls within Flood Zone 3 – high probability flood zone that comprises land assessed as having a 1 in 100 or greater annual probability of river flooding in any year.

9.81 Local Plan policy WLP8.24 relates to flood risk and sets out, amongst other things, that:

“Development proposals should consider flooding from all sources and take in to account climate change. Proposals at risk of flooding (taking in to account impacts from climate change) should only be granted planning permission if it can be demonstrated that:

- *There are no available sites suitable for the proposed use in areas with a lower probability of flooding;*
- *The development provides sustainability benefits which outweigh flood risk; and*
- *A site specific flood risk assessment has been submitted which demonstrates that the flood risk can be satisfactorily mitigated over the lifetime of the development. This should address as a minimum: finished floor levels; safe access and egress; an emergency flood plan; flood resilience/resistance measures; any increase in built or surfaced area; and any impact on flooding elsewhere including on the natural environment.*

New residential development on sites not allocated in this Local Plan or a Neighbourhood Plan will not be permitted on sites at risk from flooding.”

9.82 As the proposal is for residential development in EA flood zone 2, the EA has been consulted and have raised no objections. The application is also supported by a site-specific Flood Risk Assessment (FRA), and a Sequential Assessment Report.

9.83 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. The applicant’s sequential assessment report evidences that there are no suitable alternative sites. Given that the proposal is a comprehensive re-development of the Post Office site (including bringing the ground floor back into commercial use) it is clear the site is unique and there would not be a similar alternative at lower flood risk. The exception test provided by the applicant details the wider sustainability benefits of the scheme including the affordable housing provision and role the scheme will play in enhancing the vitality and viability of the town centre/high street.

9.84 The key point from the exception test is whether the development can be safe for its lifetime, and the proposal has been designed with that goal in mind. The FRA highlights that finished floor levels to the ground floors of the residential dwellings will be elevated to remain above flood risk levels (accounting for climate change). An Emergency Flood Plan is also detailed within the FRA to ensure safe refuge and evacuation in the event of severe storm. The FRA is comprehensive and details how the design of development will be safe for its lifetime.

9.85 Drawing on a previous matter, many interested parties wish to see the buildings to the rear retained and converted into residential use. However, it is by no means clear that a scheme to retain and convert existing buildings on site could be so resilient to flood risk, and therefore the new buildings specifically designed to be safe for the lifetime of the development is a good approach to dealing with the flood risk at this site.

- 9.86 The FRA also details strategies for surface water drainage and foul drainage that would be acceptable.
- 9.87 The suite of technical documents and evidence provided indicate that the proposal is acceptable in accordance with the objectives of WLP8.24 and the NPPF.

Ecology and Habitats Regulations Assessment

- 9.88 The application is supported by a Preliminary Ecological Appraisal and the Council's ecologist is satisfied with the conclusions of the consultant. Should planning permission be granted, the mitigation and enhancement measures identified in that appraisal should be secured by planning condition.
- 9.89 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.
- 9.90 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).
- 9.91 Officers have carried out a stage 2 Appropriate Assessment under the Conservation of Habitats and Species Regulations (2017) and conclude that, subject to a per-dwelling financial contribution to fund Suffolk Coast RAMS being secured, the proposed development will 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. Any recommendation to grant permission/consent is subject to that RAMS contribution being secured before decision.

Other Matters

- 9.92 The submitted ground investigation report identifies limited ground contamination and therefore standard conditions are recommended by the Environmental Health Officer to deal with this prior to the development being occupied.

9.93 The Environmental Health Officer has recommended a Noise Assessment be secured prior to determination. Officers are of the view that this is unnecessary, with no neighbouring land uses or activity likely to present significant sources of noise and/or disturbance to future residents.

10. Conclusion

10.1 The proposal raises a number of matters to consider and weigh up in the balance.

10.2 Lowestoft is unfortunately 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. The ground floor of the Post Office returning to a commercial use is a highly significant public benefit and will play an important role in enhancing the vitality and viability of the high street. The new housing development to the rear brings its own public benefits in the form of nine affordable homes, and residents will spend in the local economy, supporting shops and services. The proposal would also utilise a suitable brownfield site for housing, which the NPPF directs should be given substantial weight in the balance. The high-quality contemporary design of the new housing only adds to the benefits of the proposal in terms of regeneration.

10.3 The loss of two non-designated heritage assets to the rear is unfortunate, and that resultant harm to the significance of the Listed Building and Conservation Area will need to be given great weight in the balance. However, there are positive elements of demolition that will remove harmful structures/buildings and better reveal the significance of the Post Office in the Conservation Area. The works of extension and alteration will cause no harm to the significance of the Listed Building, and all form part of a proposal to create a ground floor space that can be brought back into a commercial use. The applicant's long-term implementation plan sets out a whole-building-approach, with this proposal representing a critical first stage of that regeneration process.

10.4 Considering all of the issues, with regard to all material considerations raised during the consultation period and giving great weight to designated heritage asset harm where it would arise, the planning balance clearly indicates in favour of the proposal. The public benefits that would accrue are highly significant and collectively far outweigh any harm. The proposal is considered to represent a sustainable development in accordance with the Local Plan and NPPF. Planning permission should therefore be granted.

11. Recommendation

11.1 **AUTHORITY TO APPROVE**, subject to securing the per-dwelling contribution to fund the Suffolk (Coast) RAMS, and with planning conditions including but not limited to those summarised below:

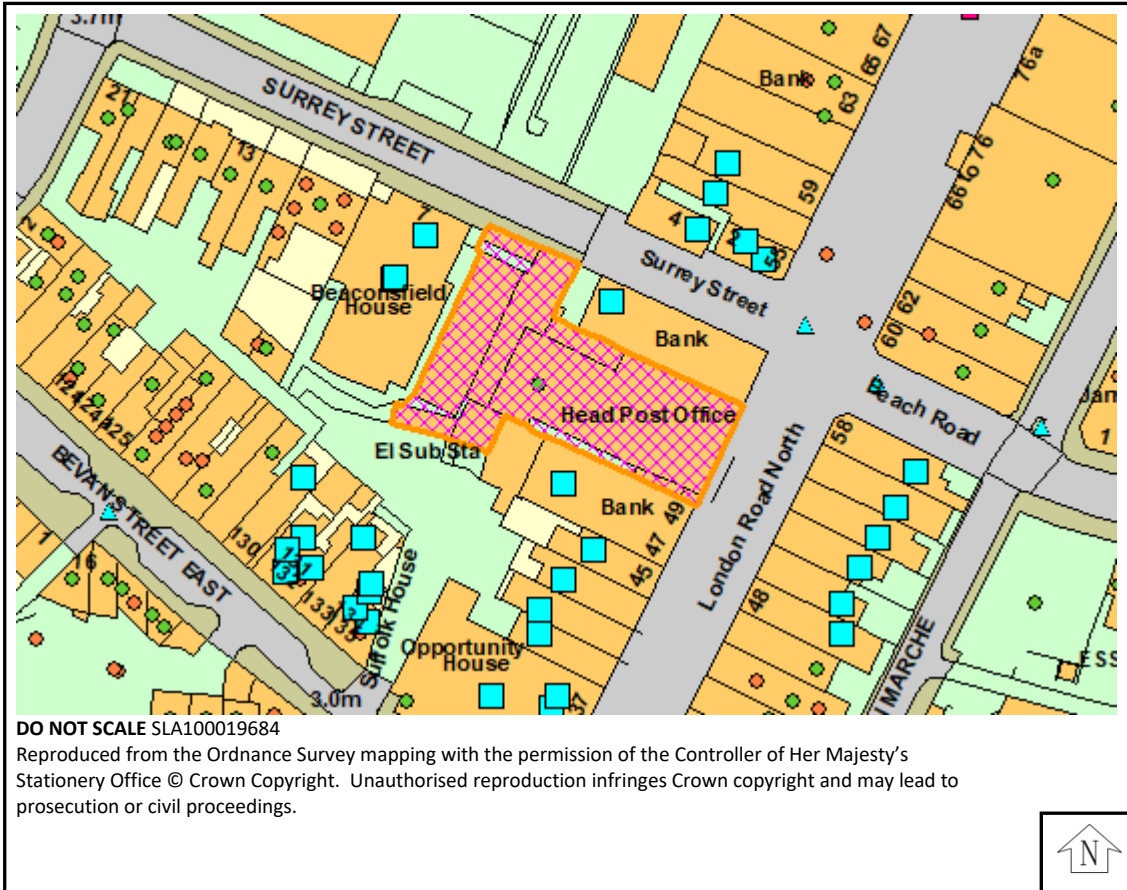
- Three-year time limit

- Standard plans compliance condition
- Mechanism to deliver Affordable Housing provision (S106 agreement) to be secured pre-commencement of development
- New building external facing materials to be agreed pre-commencement
- Hard landscaping strategy to be agreed pre-commencement
- Precise details of frontage window and door works to be agreed pre-commencement
- Precise detailing and finishes of the extension to be agreed pre-commencement
- Standard model conditions for ground contamination investigation and remediation
- Highways condition – parking/manoeuvring areas to be provided pre-occupation
- Highways condition – bin storage area to be provided and maintained
- Ecology – conditions to secure enhancement and mitigation measure from the approved Preliminary Ecological Appraisal





Background papers

See application reference DC/20/0653/FUL at <https://publicaccess.eastsuffolk.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=Q5U6YLQX06O00>

Map



Key

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