

09 June 2020

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

Dear Mr Blackmore

DC/20/1783/LBC Listed Building Consent - Repair & adaptation to the ground floor of the Post Office building including a new extension to the west, new roof to ground floor extension and re-fenestration at ground floor level.

Lowestoft Post Office 51 London Road North Lowestoft NR32 1AA

Thank you for consulting the SPS on the recently submitted LBC application. Having reviewed the Heritage Impact Assessment, the Society would like to make the following comments:

The SPS welcomes the Historic Impact Assessment prepared by Parker Planning Services which gives a thorough assessment of the history of the Post Office and the contribution that the Lowestoft Post Office makes to it. The analysis with map regression and accurate dating of the ancillary elements is helpful and will assist a balanced planning judgement to be made about the heritage harm and the public benefit of redeveloping this site for housing. However, we would take issue with the conclusion that the communal value of this group of buildings is low. Clearly the Post Office has historically played a major part in the history of the Lowestoft Town Centre over many generations and consequently makes a positive contribution to the character and appearance of the conservation area. We note the report's conclusion that the ancillary elements do not form part of the curtilage of the listed building together with the revised listing description and the consensus that the 1920s and 1930s elements are to be considered as non-designated heritage assets. We concur with the opinion about the lesser level of significance of the elements which are proposed for demolition but do not accept that their demolition is justified.

The Society considers that the demolition of the 3.5 storey brick building at the rear is unwelcome as it represents a loss of part of the building that contributes to the history of the Post Office and makes a contribution to the social history of the conservation area. The HIA demonstrates the quality of the structure and decorative elements which are contemporaneous with alterations to the principal building. They are functionally as well as historically important, are in a structurally sound condition and capable of re-use as part of the redevelopment.

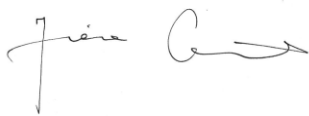
The Society has previously questioned why this scheme has not been framed in terms of the comprehensive re-use and restoration of the heritage asset including upper floors as well as the later rear wings. Para. 197 of NPPF considers applications relating to non-designated heritage assets and requires that a balanced judgement should be made having regard to the scale of any harm or loss and the significance of the heritage asset. In the opinion of the Society the loss of the rear wing will result in harm to the significance of the heritage asset and cannot be adequately justified when the majority of the listed elements remain unused and only the ground floor is proposed to be brought back into use. Furthermore, we concur with the views expressed by Historic England about the form and design of the proposed single storey extension which will replace the rear wing, which appears awkward and incongruous. We also support the advice from Historic England that the replacement of aluminum windows on the front elevation should be with timber sash windows.

Sadly, the applicant has failed to recognise the heritage value of this site and the Society regrets that the scheme does not capitalise on the opportunities to comprehensively bring this imposing and historically important building back into a long-term sustainable use. Instead the scheme promotes the loss of a major part of the building, albeit of lesser importance, and misses the opportunity to better reveal the significance of the former Post Office building. With imagination and vision the Post Office site could be successfully converted providing much needed high-quality housing while respecting and celebrating the history of Lowestoft.

Finally, our comments relating to the new build elements of the redevelopment of the site stand. We would refer you to our previous letter to the planning application Ref 20/0654/FUL dated 21 April 2020 which sets out our concerns about the scale and massing of the proposed dwellings.

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

Yours sincerely,



Fiona Cairns BA(Hons) DipTP DipBldgCons(RICS) MRTPI IHBC
Director

Cc: Lowestoft Town Council
Lowestoft Civic Society
Ward Councillor
Lynette Fawkes - Historic England
Elizabeth Martin - Conservation Officer, ESC
J de Grazia - SPS Waveney District