

9 November 2023

Mr Matthew Gee
Planning Officer, East Suffolk District Council
East Suffolk House
Station Road
Melton
Woodbridge
IP12 1RT

Dear Mr Gee,

DC/23/3400/FUL The proposal sets out the plans for a refurbished, reduced commercial unit with trade counter type frontage to 315 Whapload Road, removing the smaller protrusions to the front (South). The proposal is 784m² (GEA) Use Class E(a). This proposal includes the demolition of 250.1m² (GEA) commercial space to the front to allow a necessary refurbishment of existing walls and roof, and allowing a forecourt with associated frontage and parking to work on the development site.

315 Whapload Road Lowestoft Suffolk NR32 1UL

I write on behalf of the Suffolk Preservation Society (SPS) to object to the proposed works at 315 Whapload Road which lies within the North Lowestoft Conservation Area and the former North Lowestoft Heritage Action Zone. SPS is supportive of plans to bring this site back into use, and is aware of the degraded condition of some of the buildings on the site and in the near vicinity. However, this is a sensitive site, adjacent to grade II listed Fish House which is one of the oldest surviving structures associated with the Lowestoft fishing industry, and the proposals include the demolition of two buildings which are also considered important remnants of the town's industrial heritage.

We strongly believe that this is an opportunity to better reveal the historic past of the town and more thought should be given to how the applicant's aims can be achieved whilst safeguarding the character and significance of this group of buildings.

We fully endorse the response of your Heritage team in their objection to this application and their assessment of the heritage impact of these proposals on the Conservation Area and Fish House. The applicant's Heritage Assessment is wholly inadequate given the sensitivity of this site, focussing solely on how the proposed works to the 1960's warehouse will impact Fish House. There is no assessment of the impact of the proposed demolition of the more historic north and south ranges or of the impact of the replacement car parking on the setting of the listed building or on the character of the wider conservation area.

Historic Appraisals

The historic significance of this group of buildings is clearly and thoroughly documented in a number of widely available reports – [Historic England's Historic Area Assessment of 311-333 Whapload Road](#); the [North Lowestoft Conservation Area Appraisal and Management Plan](#), and the [North Lowestoft Heritage Action Zone Design Guide](#).

The Historic Area Assessment provides a detailed description of 315 Whapload Road, explaining that the site *is comprised of three distinct elements. Two parallel ranges of markedly different character, each presenting a narrow gable end to Whapload Road, have been truncated and combined to form part of a single industrial premises by the construction in 1966 of a large, brick light engineering workshop to the west.* The Assessment acknowledges that the ranges are in poor states of repair but dates the north range to the 17th century and the south range to the 19th century. The Fish House to the rear of 312-14 Whapload Road is one of the most significant surviving structures associated with the historic Lowestoft herring fishery.

The North Lowestoft Conservation Area Appraisal, in describing the Denes Character Area, explains that *The devastation caused by heavy bombing during the Second World War, the decline of the fishing industry and flooding in 1953 heralded the demise of the area, and widespread demolition occurred during the 1960s, leaving only isolated pockets of a once industrious community.* It identifies 315 Whapload Road as a cluster of positive unlisted buildings and provides a description of the north and south ranges: *two parallel warehouses, each with a prominent gable end abutting the pavement and facing east.* The appraisal notes that the east west orientation with gable ends facing the street and the sea is typical of the historic industrial buildings in this character area.

The Heritage Action Zone Design Guide explains that gables onto the highway *creates a strong rhythm to the streetscape.* It also clearly identifies the importance of retaining historic buildings in the HAZ area, stating that *it is vital to preserve and enhance the historical buildings that still exist here, and that the identity of Whapload Road is defined by the historical smoke houses which front onto the road and generally run in a strong east-west alignment. These typologies are unique.*

Non-designated heritage assets

The Conservation Area Appraisal identifies 315 as a Positive Non-Listed Building. Accordingly, SPS strongly suggests that the north and south ranges could be treated as Non-Designated Heritage Assets (NDHA), meeting the criteria of having historic social and communal association with Lowestoft's fishing industry, group value with the adjacent listed Fish House, as well as historic representativeness of the typology of the pre 20th century industrial buildings in Lowestoft.

The East Suffolk Council Historic Environment SPD (2021) states at para 4.5 that *it is the aim of East Suffolk Council to protect and enhance the Plan area's heritage assets through the identification of those of local significance; and through ensuring that development is managed in a way that sustains or enhances their significance and setting.*

The NPPF at para 197 is clear 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 applications that*

directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Local and national policy

The statutory test when determining planning applications in a conservation area is whether the proposals will preserve or enhance its character and appearance (S72 1990 PLBCA Act). The NPPF also sets out at para 206 that: *Local planning authorities should look for opportunities for new development within Conservation Areas ...to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.*

In this case the proposals will neither preserve or enhance the Conservation Area, resulting in the complete loss of significant buildings on this site within the Conservation Area and former HAZ. Furthermore, the redevelopment of the 1960's warehouse which is set back and parallel to the road, and the addition of carparking to the front will be completely at odds with the historic typology of this part of the Conservation Area.

The proposals are also considered to run counter to local policy WLP8.37 (Historic Environment) which states that proposals for development *should seek to conserve or enhance Heritage Assets and their settings* and WLP8.39 (Conservation Areas) which states that proposals which involve the demolition of non-listed buildings in a conservation area *will only be permitted where the building has no architectural, historic or visual significance; or 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).*

SPS therefore considers that the application is contrary to national and local planning policy and should be resisted in its current form. We trust that you find these comments helpful in the consideration of this case and ask that we are consulted on any further information or amendments that are submitted in support of this application.

Yours Sincerely,

Bethany Philbedge BSc (Hons) MSc MRTPI
Planning Officer

Ccs:

Ward Councillor

East Suffolk Heritage Team

Lowestoft Town Council