

Consultation Statement

Draft North Lowestoft Heritage
Action Zone Design Guide
Supplementary Planning Document

Published December 2019



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Introduction

East Suffolk Council Commissioned consultants Place Services to prepare the North Lowestoft Heritage Action Zone (HAZ) Design Guide Supplementary Planning Document (SPD). This will provide guidance for property owners and developers who are looking to make changes and alterations to buildings in the HAZ area. It will also provide guidance about shop frontages and the public realm. This Consultation Statement has been produced under Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The area covered by the Design Guide SPD has been extended southwards to include the PowerPark. The SPD therefore covers a wider area than the HAZ.

The Council's approach to engagement in the preparation of a Supplementary Planning Document is set out in the Statement of Community Involvement¹. While preparing the HAZ Design Guidance SPD East Suffolk Council has consulted with relevant organisations and members of the public. Details of this consultation process are set out below.

Who was consulted?

The following organisations and groups have been consulted in the preparation of the Supplementary Planning Document:

- Suffolk County Council (as Highways Authority)
- Historic England
- East Suffolk Buildings Preservation Trust
- Lowestoft Town Council
- East Suffolk Council Local Plan Working Group
- East Suffolk Council Economic Development Team
- East Suffolk Council Design and Conservation Team
- Members of the public

How were they contacted?

There were two stages to the consultation process, which are set out below.

¹ How to get Involved in Local Planning – Statement of Community Involvement (September 2014)

1. Stakeholder Meeting

The stakeholder meeting took place on the 17th of October and took the form of a workshop. The stakeholders listed below were invited, and this was undertaken via email invitation:

- Suffolk County Council (as Highways Authority)
- Historic England
- East Suffolk Buildings Preservation Trust
- Lowestoft Town Council
- East Suffolk Council Local Plan Working Group
- East Suffolk Council Economic Development Team
- East Suffolk Council Design and Conservation Team

The workshop involved a presentation given by the consultant, which described the Design Guide’s contents in detail. Attendees were given the opportunity to ask questions and discuss the document’s contents during the course of the presentation. Attendees were asked to send their views and comments to the consultant after the event. Accordingly, attendees were sent a copy of the draft document following the event to further inform any comments that they wished to make at that stage. The main issues raised by these responses are shown in Appendix 1 below.

2. Public Engagement Event

A public engagement event took place on Monday the 28th of October between 2 pm and 6.30 pm at Christ Church in Lowestoft. In total 13 people attended the Public Engagement Event. Members of the public were invited to ask questions and make comments about the draft document and its contents. Comments were received on written forms that were filled in during the event and these can be viewed in Appendix 2. The event was advertised on the HAZ website and Facebook Page as well as on Twitter. Posters were placed throughout the HAZ area along the High Street and Whapload Road. The Council also contacted the Most Easterly Community Group, which is a local community organisation. The posters can be viewed in Appendix 3.

Appendix 1 – Consultation Responses

The table below lists the main issues raised in the consultation responses, the Council’s response and how they informed the preparation of the document.

Responses from the stakeholder meeting

Page numbers referred to below are those in the final consultation version of the HAZ Design Guide SPD.

Department / Company	Comment	Response
Urban Vision C/O LTC	<ul style="list-style-type: none"> The document includes some good examples of new development but is too long. There should be more mention of the Lowestoft Neighbourhood Plan. There should be greater emphasis on the economic importance of design and the historic environment. 	<ul style="list-style-type: none"> The document contains a considerable amount of guidance, maps and illustrations, which explains its length. Text has been added to page 10 of the document that refers to the emerging neighbourhood plan. The restoration of the historic environment will help to support the economic regeneration of the area. Further consideration will be given to this when finalising the document and when responding to comments on the final document.
ESC Regeneration	<p>Section 7</p> <ul style="list-style-type: none"> The Smokehouse concept, while a good idea, is not appropriate for the Power Park area. Whapload Road South will be used by HGVs to access the Birds Eye Factory and PowerPark. Therefore, the width of the road should be retained. Wilde Street is the only point of access to the Birds Eye factory for HGVs. Raised sections of road at crossings would need to be removed. Suggests road access in the PowerPark needs more detailed work. 	<p>Section 7</p> <ul style="list-style-type: none"> The Smokehouse concept has not been taken forward through the SPD. Comments about HGV access are noted and consideration will be given to this in finalising the document alongside any comments received through consultation on the draft design guide. Detailed work about access to the PowerPark may be necessary as part of further detailed design work for the PowerPark area.
ESC Great Places Project and Cultural Capacity Coordinator	<ul style="list-style-type: none"> Drawings and examples of development were inspirational. Design Guide responds well to the identity of the HAZ area. 	<ul style="list-style-type: none"> This representation did not request any changes to the document.

Department / Company	Comment	Response
ESC Regeneration	<p>Section 7</p> <ul style="list-style-type: none"> • Overall support for the document. • Battery Green Car Park Proposal would be included in the town centre master plan document. • Need to be conscious of commercial traffic flows, particularly with regard to the PowerPark. • Positive proposals for the High Street. • One-way system on the High Street could potentially work well but there needs to be consideration of the junction with Rant Score. • The third crossing could alter traffic flow considerably and this could enable realignment of the trunk road. 	<p>Section 7</p> <ul style="list-style-type: none"> • The Battery Green Car Park proposal has been removed from the Design Guide SPD. • Measures relating to commercial traffic flows for the High Street and Rants Score would be considered as part of the detailed design stage. • The impact of the third crossing on traffic flows is potentially a separate piece of work that is outside the scope of the Design Guide.
ESC HAZ Programme Manager	<p>General</p> <ul style="list-style-type: none"> • Reference to the neighbourhood plan should be made once but ultimately the Neighbourhood Plan should be informed by this document. <p>Section 2</p> <ul style="list-style-type: none"> • Page 6: should refer to East Suffolk Council not East Suffolk District Council. • Page 6: Lowestoft Rising is a key stakeholder, not a partner. <p>Section 6</p> <ul style="list-style-type: none"> • Page 26: Change the number of scores from nine to 11. 	<p>General</p> <ul style="list-style-type: none"> • Reference to the Neighbourhood Plan relates, for information, to its emerging status. <p>Section 2</p> <ul style="list-style-type: none"> • The word ‘District’ has been removed from references to East Suffolk. • Reference to Lowestoft Rising as a project partner has been removed from the text. <p>Section 6</p> <ul style="list-style-type: none"> • The text has been amended to refer to 11 scores, not nine.

Department / Company	Comment	Response
	<p>Section 7</p> <ul style="list-style-type: none"> • The boundary on page 41 should be shown in its original position. • The East of England Park should be renamed The Ness. • Support for the smokehouse centre concept but this should be pursued separately. • Sparrow’s Nest and The Nest should be taken off the list of non-designated heritage assets and placed on a separate list of important spaces. • Photos should include examples of different types of roofing. • Support for one-way system on High Street, but this should include consideration of Rant Score. • Page 48 (Reconnecting Crown Street): Remove text regarding development of the site. Retain crossing concept. • Remove the A47 gateway to the site but there is potential to include something here because it is a key entry to the site. • Regarding the High Street there should be an emphasis on quality of design as opposed to traditional versus contemporary. 	<p>Section 7</p> <ul style="list-style-type: none"> • The text on page 6 will be amended to state that the area covered by the HAZ Design Guide has been extended southwards to include the PowerPark. The boundary for the HAZ itself has remained unchanged. The map on page 5 has been amended to illustrate this. • East of England Park is now referred to as The Ness. • Section about the Smokehouse concept has not been taken forward through the Design Guide. • A new important spaces section has been added to the text. • Photos of different types of roofing have been added to the Scores section of the document. • Rant Score will be considered as part of evolving detailed design work. • Reference to the text on page 48 will be removed but the diagrams will be retained. • The text has been amended to remove the A47 gateway to the site. • Further consideration will be given to e examples of contemporary design in finalising the document.

Department / Company	Comment	Response
	<p>Section 9</p> <ul style="list-style-type: none"> The section about internal alterations should be reduced. 	<p>Section 9</p> <ul style="list-style-type: none"> The section about internal alterations has not been taken forward in the design guide document, which allows for a greater emphasis on external alterations.
Suffolk CC Highways	<p>General</p> <ul style="list-style-type: none"> There is a need to state that changes to the highway will be made in partnership with Suffolk County Council Highway Authority. There is a need to avoid overlap with the town centre masterplan with an addendum to section 8. <p>Section 7</p> <ul style="list-style-type: none"> Page 45 (Existing Movement Network): Need to explain coloured lines. Reference should also be made to the existing cycle network in the area and the historically high levels of cycling. Page 46 (Future Movement Network): Refer to the opportunity to enhance pedestrian access along the High street, so that there is not the perception that it is finalised. Consider provision of charging points, space for car clubs and mobility for old people. <ul style="list-style-type: none"> Consider the introduction of filtered permeability at some junctions. 	<p>General</p> <ul style="list-style-type: none"> The text has been amended to state that changes will be made in partnership with SCC. <p>Section 7</p> <ul style="list-style-type: none"> A key has been added to the map on page 45 to explain what the lines represent. Reference has been made to the cycle network in the town and to the historically high levels of cycling. Text on page 46 regarding pedestrian routes along the High Street has been reworded to state that there is an opportunity to review traffic management arrangements. This makes clear that any change to traffic management is purely conceptual. The provision of electrical charging points, car club spaces and increased mobility will be considered on a site by site basis. Policy WLP8.21 of the Local Plan sets the policy context for sustainable transport measures. The issue of filtered permeability will be considered in more detail with Suffolk CC Highways at the development stage.

Department / Company	Comment	Response
	<ul style="list-style-type: none"> • Page 47 (Crown Street): Reference to the provision of a tiger crossing should be removed. However, a suitable crossing should be considered to reconnect Crown Street. <p>Section 8</p> <ul style="list-style-type: none"> • Page 49: It was suggested that text relating to provision of developable land and rationalising the A47/Whapload Road roundabout should be removed. • Pages 52 and 53: The SPD should not refer to changing routes to one way. This could be amended to 'review traffic management arrangements.' • Page 63 Blue Anchor Square: The document should not include an assumed commitment to changes in traffic movement. • A feature such as a raised table at a junction could reduce speeds and ease pedestrian movement. Additional tree planting on wider sections of pavement could supplement the presence of two larger existing trees in the Rant Score area. 	<ul style="list-style-type: none"> • The text on page 47 has been amended to incorporate the SCC comments. <p>Section 8</p> <ul style="list-style-type: none"> • Text on page 49 has been removed as requested in the comment. • The first bullet point on pages 52 and 53 has been amended to read 'review traffic management arrangements'. • The text on page 63 has been amended so that changes to traffic movement are referred to as a design element, rather than a firm commitment to change. • The text has been reworded but highways elements will be considered at the detailed design stage.
<p>SCC Highways - Footways, Street Furniture, Drainage</p>	<p>Section 8</p> <ul style="list-style-type: none"> • Use of granite on footways can cause difficulties for disabled pedestrians. • Would prefer if granite setts were not used for pedestrian routes. The use of a commuted sum at the planning application stage may help to finance the use of granite setts. However, it may be necessary for SCC Highways to undertake some repairs using asphalt. 	<p>Section 8</p> <ul style="list-style-type: none"> • Footway granite setts are proposed to be flush, not tumbled. The mortar used will allow for a continuous flush surface. • SCC Highways will be consulted regarding the commuted sum, as well as storage space for granite setts.

Department / Company	Comment	Response
Historic England	<ul style="list-style-type: none"> • Supports first draft. 	<ul style="list-style-type: none"> • Support noted.
Historic England	<p>Section 1: Introduction</p> <ul style="list-style-type: none"> • Sections 1 and 2 can be combined. • General information about HAZs may not be necessary in this document. There should just be an introduction to the North Lowestoft HAZ. • The duration of the HAZ should be placed at the end of the section. • The document must refer to North Lowestoft Heritage Action Zone, to differentiate from the one in south Lowestoft. • Paragraph 3 does not make sense. Substitute for the last paragraph in S1, with a minor additional mention of shopfronts. • The introduction should be unequivocal in the way it is worded. ‘The design guide will....’ Rather than ‘The design guide is intended to...’ 	<p>Section 1: Introduction</p> <ul style="list-style-type: none"> • The amalgamation of sections 1 and 2 will be picked up as part of the consideration of responses to the formal consultation. • Text changes to provide an introduction to the North Lowestoft Heritage Action Zone will be made as part of the consideration of comments received during the formal consultation. • Paragraph 3 has been amended to address these concerns. This paragraph provides an overview of the document and therefore doesn’t reference all elements, however consideration will be given to further references to shopfronts in the final document. • The introductory text will be amended to make it more unequivocal as part of the consideration of comments received during the formal consultation.

Department / Company	Comment	Response
	<ul style="list-style-type: none"> The map on page 5 needs to differentiate between the HAZ boundary and the total area covered by the Design Guide SPD. <p>Section 3:</p> <ul style="list-style-type: none"> Heritage Works has been updated and republished at the following location: https://historicengland.org.uk/images-books/publications/heritage-works/. The Design Guide SPD should not refer to English Heritage. There are potential quotes from Heritage Counts, which can be found at the following location: https://historicengland.org.uk/research/heritage-counts/2018-heritage-in-commercial-use/heritage-in-commercial-use/ and https://historicengland.org.uk/research/heritage-counts/heritage-and-economy/ <p>Section 4:</p> <ul style="list-style-type: none"> Historic England’s documents aren’t technically guidance according to the government. The NPPG is guidance, whereas Historic England’s are ‘advice’. We also differentiate between ‘Good Practice Advice 	<ul style="list-style-type: none"> The map has been amended to illustrate the difference between the HAZ boundary and the design guide area. The text on the final paragraph of page 6 has been amended to make clear that the HAZ Design Guide covers a wider area than the HAZ itself. <p>Section 3:</p> <ul style="list-style-type: none"> Reference to English Heritage will be deleted and replaced with Historic England. Reference has been made to the 2018 Heritage Counts, together with a link to the factsheet about heritage and the economy. <p>Section 4:</p> <ul style="list-style-type: none"> Text will be amended to reference Historic England ‘advice’.

Department / Company	Comment	Response
	<p>notes' (GPAs) and 'Advice Notes' (HEANS). This page sets out Historic England's thinking on that: https://historicengland.org.uk/advice/planning/planning-system/</p> <ul style="list-style-type: none"> • Include reference to: <p>Advice Note 1: CAs Advice Note 2: Making Changes to Heritage Assets Advice Note 12: Statements of Heritage Significance Good Practice Advice Note 3: The Setting of Heritage Assets CPPG (2008)</p> • Conservation Principles 2008 can be included, as it still represents Historic England's guiding high level principles and approach to understanding, and decision taking, irrespective of whether the words used are the same as the NPPF's. • The Conservation Area Appraisal is in the process of being updated, and will be adopted in 2020. ESC will be able to advise on whether they want the new version referenced. 	<ul style="list-style-type: none"> • The text will be amended to reference all listed documents. • Comments about Conservation Principles have been noted. • Work on the north Lowestoft Conservation Area Appraisal is not scheduled for completion until later in 2020, after the HAZ Design Guide has been adopted. However the Design Guide will be checked against working drafts of the Conservation Area Appraisal as part of the consideration of comments on the formal consultation.

Department / Company	Comment	Response
	<p>Section 5:</p> <ul style="list-style-type: none"> Really like the timeline approach but maps need to be bigger. <p>Queries whether there is there scope for including a section somewhere that deals with this local geology and its influence on the prevalence or otherwise of local building materials?</p> <p>Section 6:</p> <ul style="list-style-type: none"> North Lowestoft Heritage Action Zone is not a heritage asset and cannot itself have heritage significance. This section needs re wording so it focuses on the place rather than the HAZ project. Support for the approach taken for the boundary between High Street and Whapload Road character areas. <p>Section 6.2</p> <ul style="list-style-type: none"> The North Lowestoft Conservation Area is also a designated heritage asset and should be included. Buildings and Structures of Local Interest have been examined during the recent Conservation Area Appraisal process and this information should be available. 	<p>Section 5:</p> <ul style="list-style-type: none"> Consideration will be given to whether maps can be better presented / made bigger for the final document. Reference to geology will be added for the final Design Guide SPD. <p>Section 6:</p> <ul style="list-style-type: none"> The text explains the heritage assets, however it will be revisited when the Design Guide is finalised. <p>Section 6.2:</p> <ul style="list-style-type: none"> The text has been amended to refer to the North Lowestoft Conservation Area as a heritage asset. Information about buildings and structures of local interest in the Conservation Area has been provided to inform the document.

Department / Company	Comment	Response
	<ul style="list-style-type: none"> • It is considered that some of the buildings and spaces (fishing industry structures, Sparrows Nest) are not yet technically non-designated heritage assets. The Neighbourhood Plan may change this. • Note: 329 Whapload Road ('the Fish House') is currently being considered for listing, as is Christ Church. Decision timescales to be clarified. • This sub-section could be better located within the document. It is suggested that if it were moved forward to the beginning of the section, the Character Area maps and then the guidance for new development would follow on more directly from each other? <p>Section 7:</p> <ul style="list-style-type: none"> • Historic Core - Picture 14 and caption: The Design Guide shouldn't be too prescriptive regarding style. Today's High Street is as interesting as it is because it reflects an evolution of stylistic and architectural tastes, and Historic England support the principle of innovative modern architecture where it enhances the character and appearance of conservation areas. 	<ul style="list-style-type: none"> • Information about potential non-designated heritage assets cannot be included until the Neighbourhood Plan has been finalised. Where non-designated heritage assets are identified by the Neighbourhood Plan these will be taken into consideration in the planning application process. Due to timescales the Design Guide will be adopted before the Neighbourhood Plan. • The Council will review the information it holds about listings. • Consideration will be given to moving section 6 for the final Design Guide <p>Section 7:</p> <ul style="list-style-type: none"> • Picture 14 and its accompanying caption will be amended to emphasise the importance of high quality rather than traditional architecture.

Department / Company	Comment	Response
	<ul style="list-style-type: none"> • General: Include the recent Goldsmith Street development as an example. This is for two reasons: a) it is a relatively local example, very recent, award winning, and a bit different, and b) it has also referenced in the Town Hall Feasibility Study report as a representative example for the Mariner’s Street car park. • Agree with the East Suffolk Council point made at the workshop about the concept for the Smokehouse concept. It is supported as a concept, but it might not be appropriate to include it at this stage. <p>Section 7.5</p> <ul style="list-style-type: none"> • The two maps of existing and future movement patterns are identical. <p>Section 8:</p> <ul style="list-style-type: none"> • Please reference Historic England’s ‘Streets for All’ guidance here. https://historicengland.org.uk/images-books/publications/streets-for-all/ • On the whole, very supportive of the general proposals in this section. Particularly like Blue Anchor Square. Interested in the idea for the Gateway to the Scores – but some more detail here and clarification about access/Christ Church too. 	<ul style="list-style-type: none"> • Pictures from the Goldsmith’s development in Norwich have been added as examples to section 7. • The section about the Smokehouse Centre has not been taken forward in the SPD. <p>Section 7.5:</p> <ul style="list-style-type: none"> • The maps show subtle differences in the between present and future movement patterns. <p>Section 8:</p> <ul style="list-style-type: none"> • Reference will be made to Historic England’s ‘Streets for All’ guidance. • Site proposals about places such as Christ Church can be worked up in more detail when proposals come forward.

Department / Company	Comment	Response
	<ul style="list-style-type: none"> • Higher levels – the fisherman is shown on the elevation behind the marketplace, but that isn't on the map of possible elevations on the next page? Generally very supportive of the principle of high quality and locally derived public art to lift otherwise blank elevations. <p>Section 9:</p> <ul style="list-style-type: none"> • The principal purpose of the SPD is to guide new development and changes to external features/public spaces. It may therefore be possible to dispense with the advice for interior alterations. Much of this, if it related to listed buildings, would be dealt with through that consent process and there is already existing advice on the appropriate approach to this sort of thing elsewhere. • Energy Efficiency: Note that Part L of Building Regulations does not apply to listed buildings. 	<ul style="list-style-type: none"> • The image of the fisherman will be added to the map of possible elevations in the final document. <p>Section 9:</p> <ul style="list-style-type: none"> • Guidance about interior alterations has been removed from the document. • It is noted that part L of the Building Regulations does not apply to listed buildings.
Lowestoft TC	<p>General</p> <ul style="list-style-type: none"> • There should be full recognition of Lowestoft Neighbourhood Plan, particularly in the policy and guidance section. • The Design Guide and the Neighbourhood Plan should have a high level of compatibility. Some Design Guide content 	<p>General</p> <ul style="list-style-type: none"> • The Design Guide makes reference to the Lowestoft Neighbourhood Plan and its status. • The Design Guide does take into account and reference emerging Lowestoft Neighbourhood Plan policies as much as possible given that production of the Plan is still in its formative stages.

Department / Company	Comment	Response
	<p>should be incorporated into the Neighbourhood Plan.</p> <ul style="list-style-type: none"> • The document should be shortened and made more user friendly. <p>Section 7</p> <ul style="list-style-type: none"> • The illustrations used generally provide good examples, except for pictures 13 and 14 on page 34. It is not clear how they could relate to the High Street. • Reference to Historic England publication Conservation Principles 2008 should be removed. • There is support for the Smokehouse concept, although it is outside the scope of the Design Guide. This project could be pursued through the Neighbourhood Plan. 	<ul style="list-style-type: none"> • The Design Guide has been produced to be as concise as possible. However, the area and amount of detail covered means that it will be a large document if it is to be presented in an easily accessible format. <p>Section 7</p> <ul style="list-style-type: none"> • The specific pictures referred to have been removed. These pictures were included to provide examples of infill development that is in keeping with surrounding buildings and architecture. • Will consult with Historic England regarding the removal of reference to Conservation Principles. • The Smokehouse concept has not been taken forward through the Design Guide.

Appendix 2 – Public consultation responses

Name	Comment	Response
John Ellerby	<ul style="list-style-type: none"> • Disappointed by the document – hoped for something more radical. • Seeks to combine gentrification with encouraging economic activity. • Glad the document has been published. 	<ul style="list-style-type: none"> • The guide is appropriately aspirational whilst being realistic about what can be achieved.
Monica Brewster	<ul style="list-style-type: none"> • A sign is needed for Arnold’s Bequest. • Signage should be readable for older people. • New uses needed for Town Hall, hotels and pubs. • Money needed to restore shopfronts and fascias. 	<ul style="list-style-type: none"> • Comments about signage and history will be considered in more locally focused schemes rather than the Design Guide. • Signage will be identified within more detailed schemes with consideration given to how it can be appropriate to all ages. • It is not considered appropriate to include this detail within the Design Guide.
Agnes Lillis	<ul style="list-style-type: none"> • Supports new development and improvements to the area. • There should be an outside eating and coffee area next to Pork’s Pit. • There is a need for more cafes, an arts hub in the Town Hall and more independent shops. • A sculpture in Ness Park will encourage visitors. • The market in under the sails and in the Triangle needs more stores. 	<ul style="list-style-type: none"> • Comments noted. • It is not considered appropriate to reference such specific potential projects as an outside seating and coffee area in the Design Guide.

Appendix 3 – Poster

DESIGN GUIDANCE FOR THE HISTORIC CENTRE OF NORTH LOWESTOFT

East Suffolk Council and Place Services are preparing design guidance for the historic centre of North Lowestoft.

This will guide the restoration of historic buildings and spaces and support the wider regeneration of North Lowestoft.

You are invited to find out more about the project, and give your views:

Monday 28 October
2pm – 6:30pm

Christ Church
Whapload Road
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01502 523065 



Heritage Action Zones
Historic England