



Saxmundham Town Council

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ANNEX - points and issues of substantial concern

A. Planning context for “well-designed places”

Abellio Greater Anglia’s Planning Statement rightly draws attention to the NPPF Section 12 which sets out policy for achieving well-designed places, and lays down principles which we agree are appropriate for assessing this application. The Statement says:

“Paragraph 124 states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. This is a key aspect of sustainable development, creating better places to live and work and helps make development acceptable to communities.

5.4.4 Paragraph 127 sets out a series of design principles and confirms that decisions should ensure the following:

- Developments function well and add to the overall quality of the area for the lifetime of the development;
- Are visually attractive resultant of good architecture;
- Are sympathetic to the local character and history including the surrounding built environment;
- Establish a strong sense of place;
- Optimise the potential of the site to accommodate and sustain an appropriate mix of development, supporting local facilities and transport networks; and
- Create places that are safe, inclusive and accessible promoting health and well-being with a high standard of amenity for existing and future users and where crime and disorder and the fear of crime do not undermine the quality of life or community cohesion and resilience.

5.4.4.1 Paragraph 131 notes that when determining applications great weight should be given to innovative designs which help raise the standard of design more generally in the area.”

The Heritage Statement lodged with the application also cites the relevant passages from the NPPF, in particular:

Paragraph 192

“In determining 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.”

The points below draw on these principles.

B. Our main points of concern

1. Building design

“The proposed building design... does not meet the required standard or scale for the location and heritage of the building”

Councillors – and many residents – felt that the proposed design failed to do justice to the history and heritage of the site and previous building. While noting a number of ‘heritage’ features, which are appreciated, the single-storey building as shown in the indicative elevation CAD illustrations, is considered not to represent the sense of place and identity that the old building had, and which is required for this strategic site in a town centre, Conservation Area location, serving a wide hinterland. Many residents and councillors consider that, as a design necessity, a two storey building is required, without undue additional costs. This would also enable a broader range of functional uses to be developed, serving community and/or economic uses, as well as rail operational uses.

In terms of the NPPF principles above, we do not agree that the proposals demonstrate results that are sufficiently “visually attractive resultant of good architecture”, nor adequately reflect “the local character and history” of the Station building, and the design as shown at present does not in our view “establish a strong sense of place” nor sense of “distinctiveness”.

2. Community and passenger-serving use

“The absence of provision in the application for community and/or passenger-serving uses of the building, such as a café or shop”

While supportive of the general principle of rebuilding the Station, we (again, both residents and councillors) considered that the application fails to take adequately into account either important passenger-serving functions, or community-related uses. Other stations on the East Suffolk line have very successful cafes, for example, including management by community volunteers. Prior to the 2018 fire, the old building was on the point of being let to a community arts organisation. The current plans would appear to give no possibility of this.

In terms of the NPPF principles, we consider that the application does not adequately “optimise the potential of the site to accommodate and sustain an appropriate mix of development...”

We draw attention to the fact that over many years the building served passengers and other customers, including café and travel agency uses, i.e. it has not been mainly restricted to internal operational uses.

In terms of NPPF heritage principles, we underline “the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation”, which we consider has not yet been adequately provided for in the application.

3. Imbalance between operational and waiting-room space

“The large size of the space reserved for 'operational purposes', and the consequent smallness of the waiting room”

This is a specific aspect of the previous point. The waiting room is limited to 26 square metres, i.e. one-fifth of the size of the area reserved for “Railway operational use”. The Greater Anglia officers who attended our meeting indicated that the “operational use” might in a few years be made available for other uses, but this is not made explicit at any point in the application. With 12 seats indicatively show, the capacity of the waiting room, in bad weather for example, is too small given the overall building spatial capacity.

An additional point on waiting room: the present plan shows the ticket machine being only inside the waiting room. We propose there needs to be a ticket machine on the platform also, in case the waiting room is closed to the public at any time.

4. Platform 2

“The need for adequate shelter and seating on platform two, which, although not part of this application, should be designed as part of the Station as a whole”

We learnt from the Greater Anglia colleagues at our public meeting about proposals for Platform 2; in principle, we favour the carrying out of works there that enhance the customer experience, as well as being necessary for more practical reasons. This however exemplifies the problem of responding to an overall “concept” of works to the whole site, including Station building, Platform 2, and car park and other area, when information on the remaining proposals is limited, and has only now begun to be the subject of consultation locally by GA.

5. “The absence of provision of WCs”

This point was one raised by a very large number of those attending the public session, and town councillors share the concern. This is a matter of health and well-being for huge numbers of citizens. Railways draw large numbers of people together, and railway operators need to “create places that are safe, inclusive and accessible promoting health and well-being with a high standard of amenity for existing and future users...” GA officers cited criminal behaviour issues as a reason for non-provision, but we consider that this does not of itself justify the total absence of provision. If other passenger services were to be provided, this could provide a basis for at least partial provision of toilets, which will be required for operational staff in any event, we assume.

6. The Station in the context of the wider site

“The need to design the Station building in the context of the wider site, including any landscaping, to be sympathetic to and consistent with its Conservation Area status, and the potential for the future regeneration of the wider area”

As stated at point 4., in reality, we are dealing with three interconnected development proposals within the Conservation Area, of which only one – the Station Building – is the subject of an application. The integrated impact of the proposed Station building with the much-expanded car park, and any (as yet unspecified) landscaping works needs to be seen, the whole is surely greater than the sum of the parts. Given the apparently bland paving proposals for the car park, the importance of a “statement” building in terms of scale and design is increased, for example. One way of dealing with all in an integrated way would be to invite GA to put in a linked application for the car park area, or possibly, for the local planning authority to issue a direction restricting permitted development of the car park area under Article 4 of The Town and Country Planning (General Permitted Development) (England) Order 2015.

As a Town Council, we are looking at the regeneration of the whole area around the station; the streets are not well adapted to larger scale vehicle movements and there are other possibilities, though requiring land-owners including Network Rail and Greater Anglia, for longer-term solutions. Our aim now is to ensure that any development at this stage is positive in its own right, but not liable to close down better overall solutions in future.

7. The car park proposals

As discussed above, we are now informed that Greater Anglia propose to develop the site to expand the car park considerably, and to charge for parking there, presumably proposing to treat this development as 'deemed permission' for railway operators under the 2015 GPD Order. Concerns were expressed at the public meeting and in our Town Council meeting that the impact of this will be to expand on-street parking in other parts of the town, which is already an issue to some extent. Since we have not been consulted on this, we cannot immediately assess the impact, but there is no reason to believe it will be minimal. The Town Council's own property opposite the rail station, the Old Police Station, which has its own car parking area, is already used without permission by station visitors, and the surrounding streets are often clogged. Station Approach is specified in the Local Plan for improvements especially for pedestrians and cyclists – we fear that without accompanying traffic control measures, the car park proposals may have a series of negative knock-on impacts.

This further adds to our point about needing a planning application for the car park development, to enable an integrated view to be taken.

8. Car park and landscaping

Given the location in a Conservation Area, we consider that landscaping of quality and environmental sensitivity is essential, but to date this seems to have been almost ignored. The car park plan (seen by us for the first time in GA's presentation at the public meeting) showed "areas to be cleared of vegetation", and also pointed to "Trees to be retained". This is extremely limited, and adds to our view that, taken as a whole, the proposals are not in accordance with the NPPF principles cited above. It also seems curious that, in the planning application for the Station building, the applicant has answered the following "tree or hedges" questions in the standard form as follows:

"10. Trees and Hedges

Are there trees or hedges on land adjacent to the proposed development site that could influence the development or might be important as part of the local landscape character? No

If Yes to either or both of the above, you may need to provide a full tree survey, at the discretion of your local planning authority...."

It is a fact that there are trees on the adjacent land, and we believe that, considered objectively, they could – at minimum – be important as part of the local landscape character.

This reinforces the point that GA need to provide a full landscaping and parking plan, or (as above) that the local planning authority should consider a direction that requires an application to be made.