



# Saxmundham Town Council

The Old Police Station, Station Approach, Saxmundham, Suffolk,  
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Chief Planning Officer  
East Suffolk Council  
East Suffolk House  
Station Road  
Melton  
IP12 1RT

31st July 2019

For the attention of Chris Green

Dear Sir/Madam,

**Saxmundham Station Building - Planning application DC/19/2685/FUL from Abellio Greater Anglia (Mr John Mottershead):**

**Opinion of Saxmundham Town Council and related comments**

I am writing formally on behalf of Saxmundham Town Council to set out our opinion in relation to this application.

Saxmundham Station is in the centre of our fast-growing town, set in the Conservation Area. It also acts as 'Gateway' to the wider East Suffolk coast and other attractions. What happens to it is of fundamental importance to the town, as well as to the tens of thousands of rail users to and from the wider region.

First impressions matter. We had, until the fire of February 2018, a fine Victorian 2 storey building which – until boarded up some years earlier and allowed to decay – formed a decent entry-point to the town.

While initial plans were discussed back in November 2018 at a meeting at which the Town Council was represented, our Council – and more importantly, our residents generally - had not been consulted by Greater Anglia on their plans, which include not only the Station Building, the subject of this application, but for their site as a whole which we learn is to become in effect a paved carpark.

Once we learnt of the lodging of this application, we set about consulting our town's residents. We organised a public session to discuss the proposals, which took place last night (Monday 29<sup>th</sup>) and was followed by the Town Council's consideration of the application, in order to meet your deadline for our response.

At the public session, which was attended by around 80 members of the public, we were joined by two members of the Greater Anglia team, invited by us, who explained the plans for building, platforms and car park area, and sought to answer questions. We greatly welcome this first opportunity with GA to discuss their

plans of fundamental importance to the town, but it was simply not possible to explore or resolve satisfactorily all the issues raised in the time available.

Not only is the Station set in the Conservation Area, it is also in an area which the Final Draft Local Plan highlights within the Saxmundham Strategy:

“The strategy for Saxmundham is to:

- a) Enhance the vitality and vibrancy of the town centre, including through protecting and enhancing the historic core of the town and the railway station”.

At para. 12.279, the Draft Plan cites the Ipswich Borough & Suffolk Coastal District Retail and Commercial Leisure Town Centre Study (October 2017), which also identifies “redevelopment/regeneration of the area around the railway station” as an opportunity.

Our Neighbourhood Plan Steering Group has also identified the wider station area as a key potential site for regeneration, in which the Station Building and the GA site as a whole would form key components, and we have written to Greater Anglia and Network Rail to offer our full co-operation in assessing the potential for the area, which would bring economic, social and environmental benefits.

After listening to the representatives of Greater Anglia and to the points raised by local people, and after considering the application and related documentation, the Town Council resolved as follows:

***Saxmundham Town Council welcomes the opportunity to discuss with Abellio Greater Anglia the redevelopment of Saxmundham Station and, in particular, the wider area around the Station.***

***We also fully share the objective of an early, well-designed Station Building for Saxmundham and will work constructively towards it.***

***The Town Council nevertheless has serious concerns about the current application and therefore opposes it.***

***Our grounds and concerns include:***

- ***The proposed building design, which does not meet the required standard or scale for the location and heritage of the building***
- ***The absence of provision in the application for community and/or passenger-serving uses of the building, such as a café or shop***
- ***The large size of the space reserved for 'operational purposes', and the consequent smallness of the waiting room***
- ***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.***
- ***The absence of provision of WCs***
- ***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.***

***Our concerns, and points related to other aspects of the proposed development of the site, are further detailed in the attached Annex, which forms an integral part of our representations.***

At last night's public meeting, Greater Anglia's officers undertook to provide further information including drawings that would show the proposed design and 'look' much more clearly. They also indicated that after a period when the larger room would be used for "operational purposes", it might be made available for commercial or community purposes. However, this is not stated in the planning application.

One important issue involves the relationship between the Station Building, for which this application has been made, and the rest of the GA site, which is mainly to be turned into a larger (paying) car park, and for which no application has been made. We assume this is considered by GA to be permitted development under the Town and Country Planning (General Permitted Development) (England) Order 2015. Although this was not discussed at our meeting, I have consulted my councillor colleagues, and we believe it would be far better to deal with the whole area (building and car park) together, as the issues inter-connect. The local planning authority does have power to require this, if necessary.

As an example, in the attached Annex setting out our concerns, the issue of car park and landscaping is referred to, on which we have not been consulted. In a Conservation Area, the quality of landscaping of and around a large car park is important. We draw attention to the issue of 'trees and hedges' (last point in the Annex), as the planning application for the station building argues – incorrectly in our view - that there are no trees on the adjacent (car park) land which might be important for the landscape character.

(We have also noted a point of apparently inaccurate wording of the planning application: "...the construction of a new flat roof to the single-storey brick structure.." which is in fact contradicted by the planning statement and drawings for the building, which show a pitched roof for the main area.)

We are confident that, with appropriate information, consultation and some improvements, an acceptable solution can be found, given the will and a little more time. We are anxious not to let the present awful condition of the Station continue for long, but it is worth a little time to get the right design and solution.

For information, we have drawn up a petition to Greater Anglia which summarises many residents' concerns, has proved popular, and which asks GA to :

- (i) carry out full consultation, as a matter of urgency, with residents and users of the station over the design of the station building and surrounds, to find a solution acceptable to all parties, in keeping with the heritage of the building, and the Conservation Area,
- (ii) ensure that the building is available for services for rail users such as café, and relevant community facilities
- (iii) work with the Town Council and interested parties on plans for a redevelopment of the station area that brings economic, social and environmental benefits.

Yours faithfully,

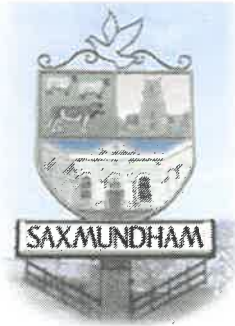


Jeremy Smith

Chairman,

Saxmundham Town Council

07951 032 283



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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.