



# Planning & Heritage Statement

***Proposed partial demolitions, refurbishment and rebuild of Saltash Train Station to provide improved rail patron facilities including; WCs, waiting room, A3 (cafe) and B1 (office) and associated works***

***at “Saltash Train Station, Saltash, Cornwall”***

***On behalf of Saltash Town Council***

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| Revision/issue no.  | P0       |  |  |  |
| Date                | 06/06/18 |  |  |  |
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**1. Introduction**

- 1.1. This Planning & Heritage Statement (statement) has been prepared by Bailey Partnership's Chartered Town Planning service on behalf of Saltash Town Council (the applicant) in support of a full planning application for:

*"Proposed partial demolitions, refurbishment and rebuild of Saltash Train Station to provide improved rail patron facilities including; WCs, waiting room, A3 (cafe) and B1 (office) and associated works"*

- 1.2. This statement provides a description of the site and proposed development and analysis of the main design considerations raised by the proposals. It contains reference to both local and national planning policy and provides an overall assessment of the proposal.

## 2. Site Location and Description

- 2.1. The site is known as “Saltash Train Station”.
- 2.2. The site is currently described as being “in a semi-derelict state”.
- 2.3. The site is situated off Albert Road with residential development on all boundaries. To the north west lies the “pay and display” car park known as Alexandra Square which is approximately 60m from Saltash Train Station. Beyond Alexandra Square lies Fore Street, the main shopping street in Saltash.
- 2.4. The entire site falls within Flood Zone 1, the area least at risk of flooding.
- 2.5. The application site adjoins the the Grade I listed “Royal Albert Bridge and Seventeen Approach Spans” (list entry number: 1159292). Immediately west of the application site lies Grade II listed “38 Albert Road” (list entry number: 1140393). The site is also within the Conservation Area known as Lower Fore Street, Saltash.

### **3. Relevant Planning History**

- 3.1. PA13/07609 - Prior notification for the change of use of B1(A)(offices) to a dwelling - Planning Permission Required 11th October 2013.
- 3.2. E2/08/02056/FUL - Renovation and conversion of existing railway station to form two offices and provision of parking area - Conditional Approval 15 January 2009.
- 3.3. E2/05/00338/FULR - Change of use of former station to Brunel Heritage Centre and extension and reinstatement of canopy (renewal of planning decision 00/00097/FUL - Conditional Approval 5th May 2005.

#### **4. The Adopted Development Plan (DP)**

4.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the provisions of the Development Plan (DP) unless material considerations indicate otherwise. In this instance the Cornwall Local Plan (Adopted November 2016) provides the adopted DP.

4.2. The relevant DP policies are as follows:

- Policy 1 - Presumption in favour of sustainable development
- Policy 2 - Spatial strategy
- Policy 3 - Role and function of places
- Policy 4 - Shopping, services and community facilities
- Policy 12 - Design
- Policy 13 - Development Standards
- Policy 16 - Health and Wellbeing
- Policy 21 - Best use of land and existing buildings
- Policy 24 - Historic Environment
- Policy 27 - Transport and accessibility

4.3. The above policies are dealt with in Section 6.

## 5. Other Material Planning Considerations

### ***National Planning Policy Framework (Framework)***

5.1. The Framework sets out the Government’s planning policies for England and how these are expected to be applied.

5.2. The Framework is an important material consideration that, on its own, is of such weight that it can justify a decision contrary to the relevant policies of the DP.

5.3. Paragraph 7 sets out the three dimensions to sustainable development which are “*economic, social and environmental*”.

5.4. Paragraph 14 of the Framework states that there is a:

*“presumption in favour of sustainable development... for decision-taking this means:*

- *Approving development proposals that accord with the development plan without delay”* (Paragraph 14, the Framework).

5.5. Paragraph 17 of the Framework states that planning should:

*“Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value”...*

[and]

*“actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable”* (Paragraph 17, the Framework).

5.6. Paragraph 19 states:

*“The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system”* (Paragraph 19, the Framework).

5.7. Paragraph 29 states:

...”The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel...” (Paragraph 29, the Framework).

5.8. Paragraph 35 of the Framework states:

*“Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people...”* (Paragraph 35, the Framework).

### **Cornwall Local Plan: Community Network Area Sections**

5.9. Saltash is identified as a “key settlement” in the Community Network Area (CNA) known as the Cornwall Gateway.

5.10. Amongst the specific objectives set for the CNA as a whole.

5.11. Objective 1 - Regeneration, states: *“Support the regeneration of Saltash and Torpoint town centres”*.

5.12. Whilst Objective 4 - Transport, states: *“Support the improvement of public transport between the rural and urban areas”*.

### **Emerging Neighbourhood Plan**

5.13. The Saltash Neighbourhood Development Plan was designated as a Neighbourhood Area on 11th January 2013. The proposed Neighbourhood Plan is at a relatively advanced stage in that the Consultation Draft is available and formal consultation on the plan is due to take place in June 2018. Once adopted the Neighbourhood Plan will carry the same weight as the Cornwall Local Plan in the decision making process. The policies can therefore be afforded reasonable weight in the decision making process.

5.14. Proposed policy CON5 - Saltash Station is particularly relevant in this instance and is stated below in full for reference:

*“Regeneration proposals for Saltash Station building will be supported if they incorporate measures to support the delivery of an enhanced public realm around the station aimed at reducing conflicts and promoting sense of place for arriving/departing passengers. These may include:*

*a. improved comfort and convenience of pedestrian access, including improved access for mobility impaired users through improved surfaces, level transitions, and handrails;*



- b. quality signage;
- c. tree planting;
- d. cycle parking;
- e. public seating;
- f. trolley friendly surfaces;
- g. disabled parking;
- h. Drop-of
- i. a taxi rank ;
- j. cycle and car electric charging points”

- 5.15. Alongside proposed policy CON5 the ‘pre-amble’ sets the scene and what the regeneration and refurbishment of the site could achieve:

*“The Saltash Station Building is currently in a semi-derelict state which detracts from the setting of the Royal Albert Bridge (a Grade 1 Listed Building), substantially harms the impression given to thousands of tourist and business visitors arriving/ departing from Cornwall via this gateway, and may deter local rail users. The retention, preservation and reuse of the building could bring substantial environmental and economic benefits. Only 1% of journeys to work from Saltash are by rail and huge potential exists to attract more users by improving the access and attractive of the staton. In the community survey held during summer 2016, some 96.8% of people supported the idea of providing passenger facilities, such as a cafe, toilets, waiting room and ticket sales, at Saltash Station, making use of the current staton building. Around 89% of respondents said they would be more likely to use the railway if such facilities were available” (page 77, Emerging Neighbourhood Plan).*

### **Cornwall Site Allocations Development Plan Document (DPD) (2017)**

- 5.16. The DPD provides an overview of Saltash’s Transport Strategy. The strategy sits within the context of Cornwall Council’s overarching transport strategy, Connecting Cornwall.

*“Situated on one of two trunk roads into Cornwall, Saltash is the gateway to Cornwall from Plymouth. There are over 9,000 daily commuter trips between South East Cornwall and Plymouth and the vast majority of these are from Saltash. This is partly due to an imbalance between housing and jobs in the town with 43% of the town’s working population commuting to Plymouth. This presents a challenge in reducing the number and length of trips generated in the town. The high frequency of bus services to Plymouth makes bus more attractive than rail for commuting. Consequently the rail network is underutilised (1% of the town’s working population travel to work by rail). Despite the strong bus network, 67% of 285 travel to work trips are still made*

*by car. The demand to travel to Plymouth for employment and shopping puts pressure on the Tamar crossings and the road network on both sides of the River Tamar. Recent study work has identified a number of capacity improvements to the bridge and surrounding network capacity that will be required in the longer term. This includes improvements to the cycle routes between Plymouth and Saltash” (page 284-285, Cornwall Site Allocations DPD).*

- 5.17. Furthermore, Table Slt3: Transport Strategy Projects states that Rail improvements include station frontage and access improvements:

*“improved access and legibility of walking and cycling routes to the stations; additional cycle storage; the provision of a half-hourly mainline rail service between Penzance and Exeter” (page 286, Cornwall Site Allocations DPD).*

- 5.18. Alongside this there is a commitment by Cornwall Council to *“lobby for improved train services (frequency and connectivity) for Saltash” (page 286, Cornwall Site Allocations DPD).*

- 5.19. The Saltash Town Framework: Transport Strategy 2030 identifies *“improvements that support pedestrian access and passenger comfort” (page 288, Cornwall Site Allocations DPD).*

- 5.20. The allocation known as “Broadmoor Urban Extension” to the north of Saltash is seeking to provide approximately 1,000 dwellings and the improvements to Saltash Station will encourage sustainable trips.

## 6. Heritage Statement

### ***Planning (Listed Buildings and Conservation Areas) Act 1990***

6.1. Under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, when considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. In this instance it is clear that the proposals are consistent with the aims and requirements of the primary legislation and planning policy and guidance. The proposals would not have an unacceptable impact on the listed building or its setting and would preserve the significance of the designated heritage asset.

6.2. This assessment considers the impact of the proposals on the significance of the nearby heritage assets:

- Grade I listed “Royal Albert Bridge and Seventeen Approach Spans” (list entry number: 1159292);
- Grade II listed “38 Albert Road” (list entry number: 1140393).

6.3. The site is also within the Conservation Area known as Lower Fore Street, Saltash.

6.4. In accordance with paragraphs 128 and 129 of the Framework:

*“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary...”* (Paragraph 128, the Framework).

*“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal”* (Paragraph 129, the Framework).

### ***National Planning Policy Framework (the Framework)***

6.5. Paragraphs 131, 132 and 134 of the Framework are relevant for the determination of application which affects a designated heritage asset.

6.6. Paragraph 131 states:

*“In determining planning applications, local planning authorities should take account of:*

- *The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.*
- *The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- *The desirability of new development making a positive contribution to local character and distinctiveness”* (paragraph 131, the Framework).

6.7. Paragraph 132 states:

*“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional”* (paragraph 132, the Framework) [Bailey Partnership underline].

6.8. Paragraph 134 states:

*“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use”* (paragraph 134, the Framework).

### **National Planning Practice Guidance (NPPG)**

- 6.9. The NPPG adds further clarity on assessing whether a proposal is likely to have a substantial impact upon the heritage asset as follows:

*“...In general terms, **substantial harm is a high test**, so it may not arise in many cases... It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting” (Paragraph:017 Reference ID: 18a-017-20140306, NPPG) [Bailey Partnership bold and underline].*

- 6.10. The NPPG also states:

*“Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals” (paragraph: 009 Reference ID: 18a-015-20140306).*

*“The “setting of a heritage asset” is defined in the Glossary of the National Planning Policy Framework.*

*A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.*

*Setting is the surroundings in which an asset is experienced, and may therefore be more extensive than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not.*

*The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.*

*The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or*

*experience that setting. This will vary over time and according to circumstance.*

*When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation" (Paragraph: 013 Reference ID: 18a-013-20140306) [Bailey Partnership underline].*

## **Assessment of 'Harm'**

### **Archaeology**

- 6.11. There are no significant ground works that would impact upon any potential archeology.

### **Setting and Significance**

- 6.12. The existing building is, whilst described as being in a semi-derelict state, intact. Therefore the impact upon the heritage assets is largely contained to the modest extension.
- 6.13. However, given the proposed sympathetic design, the proposed extension and associated external works are not considered to have a significant detrimental impact upon the setting of the conservation area nor the Grade I and Grade II listed heritage assets.
- 6.14. The train station itself is currently viewed in context with these heritage assets and the Grade I listed Royal Albert Bridge and Seventeen Approach Spans given that the site and this structure are interdependent. However, the current arrangement is not subject to change under this application and therefore the relationship and significance remains as existing.
- 6.15. In respect of the impact upon the Grade II listed 38 Albert Road again the existing building provides the existing setting and context in which 38 Albert Road is viewed. The proposed extension is, as stated above, designed sympathetically to the existing building and thus will not impact upon the significance of this heritage asset.
- 6.16. For the reasons already referred to above the proposals will also have an acceptable impact upon the conservation area.

- 6.17. In fact the refurbishment and reuse of the train station will deliver significant enhancements to the setting and significance of both heritage assets and the conservation area as a whole.
- 6.18. As detailed above, no particular element of the proposals will cause “substantial harm” to the heritage assets or their setting.

### ***Conclusion***

- 6.19. If necessary, further details can be secured during the application process. The applicant would however welcome the early engagement with the local planning authority wherever further details are required in order to avoid pre-commencement conditions.
- 6.20. It is therefore clear that the proposed works are sympathetic and result in less than substantial harm to the setting of the heritage assets or the conservation area. The proposal is therefore considered to be in accordance with paragraph 131, 132 and 134. In fact the proposals result in substantial public benefits.

### **Substantial Public Benefits**

6.21. The NPPG defines public benefits as follows:

*“Public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework (paragraph 7)”.* (Paragraph: 020 Reference ID: 18a-020-20140306).

6.22. The proposed development would provide a number of public benefits which further weigh in its favour and these are outlined at paragraphs 7.23 - 7.27.

### **Conclusion**

6.23. The proposals have been carefully considered against the relevant legislation, policies and guidance.

6.24. The proposals are plainly in accordance with Paragraph 134 of the Framework given that it will lead to less than substantial harm to the significance of the heritage assets identified above or the conservation area.

6.25. Furthermore the proposals will deliver significant public benefits (see paragraphs 7.23 - 7.27 below).

6.26. Therefore, the proposals are acceptable in terms of heritage impact and should be approved without delay.



## 7. Assessment

### ***Accord with Adopted DP***

- 7.1. The adopted DP clearly supports the proposed refurbishment and reuse of Saltash Train Station.
- 7.2. Principally the proposals accord with Policy 27: Transport and Accessibility, which safeguards and promotes strategic transport opportunities and encourages the use of sustainable means of transport as set out at point 6 and 7 respectively.
- 7.3. The proposals provides 3 cycle hoops. The proposals are therefore also supported by Policy 16, points 3 and 4 which seek to enhance active travel networks and provide appropriate cycle storage respectively.
- 7.4. The proposals provide ancillary A3 (cafe) and B1 (office) as well as a significant upgrade to the existing train station and related facilities. The refurbished train station will provide a more attractive facility to rail users and provide an opportunity to encourage people to travel to work via train. Thus the proposals will provide a significant opportunity to generate and sustain economic activity in line with Saltash's status as one of the key settlements in which development will be focussed. The proposals are therefore in accordance with Policy 2 and 3 and through efficient reuse of a brownfield site the proposals also accord with Policy 21.
- 7.5. The train station is a community facility and the proposals include the provision of rail user facilities and amenities, thus the proposals are in accordance with Policy 4.
- 7.6. The design of the proposals as detailed further in the Design and Access Statement and supporting plans is sympathetic to the sites heritage and the proposed extension is proportionate to the existing building, replicating the rhythm and proportionality of the main building. The proposals are therefore in accordance with Policy 12 and 13.
- 7.7. As set out in Section 6 above the proposals have also carefully considered the existing built environment and the listed building and structure adjacent to the site. The proposals are therefore in accordance with Policy 24.
- 7.8. Therefore as a result of the clear accordance with the above mentioned policies the proposals can also be said to accord with Policy 1: Presumption in favour of sustainable development, which declares that development in

accord with the Development Plan is sustainable development which should be supported.

### ***Wider Principle of Development***

- 7.9. There is strong support for the redevelopment and effective reuse of brownfield land in the Framework in paragraphs 17 and 111.
- 7.10. The Framework also provides clear support for encouraging and facilitating economic growth (paragraph 19, the Framework) which the proposals clearly seek to achieve.
- 7.11. The site is well related to the main “town centre” which lies immediately north west of the site and therefore increased use of Saltash Train Station will ultimately result in an increase in trading potential for Saltash Fore Street.
- 7.12. Where possible within the ownership of the applicant the proposals provide for the desirable features listed in Consultation Draft Neighbourhood Plan Policy CON5. Specifically these include: an enhanced public realm around the station through the upgrading of the station building, improved comfort and convenience of pedestrian access, including improved access for mobility impaired users through improved internal surfaces, level transitions and internal and external public seating.

### ***Permitted Baseline***

- 7.13. Saltash Train Station is currently operational despite the Consultation Draft Neighbourhood Plan describing it as being in a “semi-derelict state”. Therefore its permitted use is as a train station. Should the development be brought forward by a “railway undertaker” there are permitted development rights in Part 8, Class A of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) which make provisions for certain development to take place without planning permission.

### ***Amenity***

- 7.14. In terms of the impacts upon amenity the proposed use, the primary use of the site remains as a train station and the proposed facilities within the main building are ancillary to that principle use. The A3 use is provided alongside an open plan space for passengers through the main entrance and the business space (B1) is provided off of the open plan space. These proposed ancillary uses will not materially affect the overall character of use of the site.

### ***Transport***

- 7.15. The site is accessible by foot, bicycle, public transport and private vehicle. There are 5 car parking spaces within the site envelope. Beyond this parking provision there is the 'pay and display' car park known as Alexandra Square, where there is unrestricted car parking (24 hours).
- 7.16. There is an informal set down and pick up point provided on street, adjacent to the main entrance to the station, as there are no Traffic Regulation Orders in place and therefore allow for minibuses and taxis to serve the site.
- 7.17. The availability of on-site parking and the benefit of good public transport links are attractive for encouraging the use of the station.

### ***Ecology***

- 7.18. The Ecology Report provided in support of this application concludes that the building does not support a bat or bird roost. The proposals do however provide for the ecological enhancements as recommended in the Ecology Report and thus result in a net gain in terms of biodiversity.

### ***Contamination***

- 7.19. The contaminated land report concludes that the site is capable of being redeveloped as proposed.

### ***Local Support & Consultations***

- 7.20. The council have been instrumental in raising the profile of the project, making particular use of social media to reach out and share the message. The twitter tag @saltash\_station has been particularly successful with obtaining votes for the AVIVA Community Fund - with the project being shortlisted to provide some funding towards improving accessibility and use of the station - such as the provision of an accessible passenger WC.
- 7.21. Saltash Rail User Group, as part of the neighbourhood planning process, undertook a survey of local residents and established rail users by form of an online survey.
- 7.22. In addition to the above details of the engagement work undertaken by The Real Ideas Organisation (RIO) is provided in Appendix 1 to this Planning Statement.

### ***Significant Benefits of the Proposal***

- 7.23. The proposals change of use would significantly improve the current state of repair of the currently vacant building and provide an overall improvement to the amenity of the area through its active use. This is a clear social and environmental benefit of the proposals.
- 7.24. The proposed ancillary A3 and B1 uses will generate additional employment opportunities. The proposals would deliver significant economic and social benefits through the creation of jobs and money returning to the local economy through the purchase of goods and services. This is a significant economic benefit of the proposals.
- 7.25. The proposals will also deliver a significant social and economic benefit through the creation of jobs during the construction phase.
- 7.26. The proposals would encourage the use of the train station as a sustainable means of transport and is therefore a significant environmental benefit of the proposals.
- 7.27. The above mentioned significant benefits are considered to be of such weight that these can justify a positive determination of the application. This is in addition to the clear support afforded by the adopted DP.

## **8. Conclusion**

- 8.1. The proposals are clearly supported by the adopted DP and the Framework, as discussed in detail in Section 7 above, and therefore should be approved in accordance with paragraph 14 of the Framework.
- 8.2. Further, there are significant social, economic and environmental benefits resulting from the proposals (as set out at paragraphs 7.23 - 7.27), which carry substantial weight in its favour. Therefore the proposals should be approved without delay.