



Waveney District Council
Planning Policy
Town Hall
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11th June 2010

Dear Sir / Madam

Thank you for the opportunity to comment on the Lowestoft Lake Lothing & Outer Area Action Plan – Further Preferred Options. Network Rail is an agency responsible for delivering a reliable and safe rail network and also to maintain, improve and upgrade every aspect of the railway infrastructure. Network Rail has a diverse and significant property portfolio, and, where not required operationally, it is generally used to fund improvements to the rail network through maximising the commercial value of its estate by redevelopment or enhancement of the existing portfolio where ever possible.

A number of the policies within the AAP are relevant to Network Rail; the Company is supportive of policies which aim to improve the existing station, but object strongly to the relocation of the station building. Our position is set out below.

Policy TML1 – Sustainable Transport - Support

Network Rail agrees that developer contributions should help to pay for necessary transport infrastructure. New development will benefit directly from the railway infrastructure in place and demand for the rail services will increase as a result.

The Council could consider creating a contributions pool which distributes funds to improve vital infrastructure. Lowestoft Railway Station should be identified as a strategic site within the Council's 'overall fund' which would benefit from developer contributions.

Policy TML2 – Pedestrian and Cycle Network Improvements - Support

Network Rail encourages the promotion of sustainable transport choices and improved cycle facilities at the Lowestoft Railway Station.

Policy TML3 – Public Transport Network - Support

This policy supports the *'creation of an enhanced rail/bus/taxi/cycle interchange at Lowestoft Station with sheltered waiting facilities, seating and real-time information.'* These improvements should be encouraged as they would benefit the passengers and increase the use of the railway. In line with TML 1, a developer fund should pay for these improvements.

Policy TML4 – Lowestoft Station Interchange - object

Central to Policy TML 4 is the relocation of the station 40m to west and 80m to the south. It is argued within the AAP that the *'40:80' option was deemed to strike the optimum balance between commercial viability, technical feasibility and acceptability in the eyes of key stakeholders and landowners'* (Policy TML 4). As the principal stakeholder and landowner Network Rail, as previously made clear at earlier stages of consultation, does not support the relocation of the station and our position is reaffirmed below.

Passenger usage

Moving the station building to a more remote and less accessible location could reduce its passenger patronage as was the case in Felixstowe, Cromner and Sheringham. Moving the station to a less developed area represents a risk that does not align with Network Rail's aim of increasing passenger usage nor is it likely to be popular with franchisees.

Operational

The operational disruption caused by relocating the station building cannot be justified. It has not been identified how moving the station will improve the safety and reliability of the services or customer satisfaction. This would also be coupled with the short term disturbance to passenger and freight trains.

Financial cost

Moving the station building would incur a substantial financial cost which Network Rail cannot support. Network Rail is budgeted through Control Periods which last for five years. The Control Periods help to guide the company's activities and enables longstanding commitments to be made to maintain and improve the railway. The company are currently in Control Period 4 (2009-2014) and this proposal has not been allocated funding within the Route Utilisation Strategies (RUS) or the National Stations Improvement Programme (NSIP).

Network Rail would like to see the option to relocate the station removed from Policy TML 4. Other policies and parts of the AAP which need to be changed include:

Page 2 – 4 Objective 4 – To realise an enhanced retail centre – object

'The railway station will be reconfigured to be at the heart of a new retail area.'

5.7 Implementation and Monitoring Framework Objective 9 – To be better connected – object

'and the relocation of Lowestoft Station which enables development at Peto Square,'

Page 4 – 13 SSP2 - Peto Square Proposals - object

'New railway station facilities located 80 metres west and 40 metres south of the existing station with associated passenger facilities and reconfigured platforms (TML4)'

Page 5 – 5 IMP2 – Strategic Infrastructure – object

The Council will work to ensure the timely delivery of the following strategic infrastructure within the AAP area to facilitate the wider regeneration of Lowestoft:

'Station relocation at Peto Square;'

Alternative proposal

Network Rail recognises that the proposed relocation of Lowestoft Railway Station impacts directly a number of key policies within the AAP. These include the creation of *'up to 17,500 sq m of commercial floorspace [for] use class A1-A5'* at Peto Square. There may be scope for future development if it was integrated with the existing station. A more practical and feasible solution addressing Policy TML4 would be to:

- Improve existing station building (in line with Policies TML 2 and TML 3)

- Preserve the heritage and architectural significance of the current station - particularly the last remaining British Rail sign.
- Integrate and incorporate the existing station with new development; Network Rail would be open to explore the possibility of consolidating commercial schemes around the station building.

We would be happy to discuss such a proposal further with you.

Policy SSP10 – Peto Way/Denmark Road Corridor – objection

This policy designates the land in this area for purely employment uses. As major landowners, Network Rail is concerned that such a designation would not be financially viable. Take up of space would rely on the relocation of businesses from elsewhere in Lowestoft, which is difficult to predict. It is also questionable how development consisting purely of employment uses would compliment the residential uses to the north of Denmark Road.

A more viable alternative would be to encourage a mix of uses which ensured compatibility with the surrounding area and could be effectively delivered. The Interim Local Plan (2004) recognises the benefits of mixed use development and identifies how it should be located around accessible areas which promote sustainable modes of transport – such as Denmark Road. Business and retail units can be located at ground floor levels to mitigate flood risk. Also, increased housing provision is encouraged by PPS 3 in areas that are accessible to sustainable transport modes. In the original proposal map (ref: H1.1 Local Plan revised draft – orange hatching) 1.22ha of land at Denmark Road was allocated for housing 100 dwellings. Network Rail therefore considers that with sensitive design such development would be viable and the designation reinstated.

Policy SSP10 should therefore read:

Approximately 3.2 ha of space within the vicinity of Peto Way/Denmark Road corridor should be allocated for employment, retail and housing development comprising of A/B/C uses. This designation will encourage a deliverable and fluid mix of uses, in line with Planning Policy Statements 1,3 and 4, which will be able to react to market conditions. Land here will present alternative locations for business and retail displaced by other strategic uses. It will also

provide residential uses which would reflect the existing character of Denmark Road.

Thank you for consulting with Network Rail. We would be interested to be kept up to date how with the progression of the Area Action Plan. We would be pleased to discuss any of the above points further.

Yours faithfully,

James Dingwall

Town Planning