Listed building consent for internal and external alterations to allow the provision of altered level at side access door, CCTV and remotely controlled door lock at Godalming Railway Station, Station Approach, Godalming GU7 1EU

Committee: Central Area
Meeting Date: 12/06/2019

Public Notice: Was Public Notice required and posted: Y
Grid Reference: E: 496623 N: 143939

Town: Godalming
Ward: Godalming Central and Ockford
Case Officer: Kate Edwards
Expiry Date: 14/02/2019
Time Extended Date: To be confirmed
Neighbour Notification Expiry Date: 15/02/2019

RECOMMENDATION That, subject to conditions, Listed Building Consent be GRANTED

Introduction

The application was deferred by the Central Planning Committee on 17 April 2019, pending the receipt of elevation plans to allow for reliable visualisation of the proposal. The amended plans have subsequently been submitted, and extracts from them are included below.

Location Plan
Godalming Railway Station is located between Station Approach and the railway line and is single storey, apart from the former Station Master’s House which is a two storey building. An area of parking lies to the front of the site.

Proposal

This Listed Building Consent application relates to works that affect the existing historic structure, specifically:

- Penetration through external wall for CCTV camera cabling, mounting CCTV camera on external wall and containment run internally with the electrical switch room;
- Regrading of floor level to existing side entrance, altering the height where it abuts the existing wall;
- Alterations to the booking hall / platform door to provide door control with an emergency release located in the ticket office with associated containment and cable penetration through internal wall.

The submitted plans, for completeness, however, also include details of other works which, importantly, fall outside of the scope of this application but are shown to provide an overview of proposed works, including:

- Installation of a glass and aluminium / steel enclosure with roller shutter on platform 2 to the side of existing side entrance;
- Installation of three automatic ticket gates, one wide aisle, Station Control unit intercom receiver; customer information screen and heater;
- Relocation of two ticket vending machines with new canopy and repair of tarmacadam floor;
- Removal of telephone box and make good tarmacadam floor;
- Removal of two passenger validators;
- Removal of modern galvanised steeel fencing and gate;
- Relocation of lighting column and station sign;
- New bollards to provide a protected walkway between enclosure and station building; and,
- Close of unpaid entry on Platform 1 by installation of steel fencing and gate with intercom receivers.

In a supporting email, the applicants have confirmed that not all of the works require Listed Building Consent, only those affecting the existing structure and fabric, although all works have been included to give an overview. It is also confirmed that all works fall under Permitted Development and, as such, planning permission is not required.
Whilst an officer assessment of whether the works fall within permitted development is not the subject of this application, in order to provide clarity to those undertaking the decision, this matter has been assessed by officers. The assessment has concluded that the proposed works fall within Class A of Part 8 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended). The development is considered to be “development by railway undertakers on their operational land required in connection with the movement of traffic by rail.” It does not fall within any of the categories of such development which are excluded from the permitted development right.

Proposed layout plan

Elevation details of the CCTV unit
Door lock mechanism detail (internal elevation)

Relevant Planning History

The most recent and relevant planning history includes:

<table>
<thead>
<tr>
<th>Application Number</th>
<th>Description</th>
<th>Status</th>
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<tbody>
<tr>
<td>PRA/2015/0022</td>
<td>Application for Prior Approval under Part 18 of the Town and Country Planning</td>
<td>Prior Approval Granted</td>
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<tr>
<td></td>
<td>Act (General Permitted Development) Order 2015 for the construction of</td>
<td>03/11/2015</td>
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<td></td>
<td>enclosed footbridge comprising two passenger lifts on both platforms.</td>
<td>Implemented</td>
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<tr>
<td>PRA/2015/0014</td>
<td>Application for Prior Approval under Part 18 of the Town and Country Planning</td>
<td>Prior Approval Refused</td>
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<tr>
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<td>Act (General Permitted Development) Order 2015 for the construction of</td>
<td>25/09/2015</td>
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<tr>
<td></td>
<td>enclosed footbridge comprising two passenger lifts on both platforms.</td>
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<tr>
<td>WA/2015/2171</td>
<td>Listed Building consent for demolition of existing structures and the infill</td>
<td>Listed Building consent</td>
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<td></td>
<td>of an existing underpass</td>
<td>Granted 27/01/2016</td>
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<tr>
<td>WA/2013/1845</td>
<td>Listed Building consent for alterations</td>
<td>Listed Building consent</td>
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<td>Granted 13/12/2013</td>
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Planning Policy Constraints

Developed Area of Godalming
Conservation Area
**Development Plan Policies and Guidance**

The development plan and relevant policies comprise:

- Waverley Borough Local Plan 2002 (retained policies February 2018): D1; D4; D6; HE3; HE5.
- Godalming Neighbourhood Plan: GOD1; GOD5; GOD6. This plan is emerging, but carries significant weight.

In accordance with the National Planning Policy Framework (NPPF) due weight has been given to the relevant policies in the above plans.

Other guidance:

- National Planning Practice Guidance (2014)
- Godalming Design Statement
- Godalming CAA (2013)

**Consultations and Town/Parish Council Comments**

| Town/Parish Council | None to report |
Representations

In accordance with the statutory requirements and the “Reaching Out to the Community – Local Development Framework – Statement of Community Involvement – August 2014” the application was advertised in the newspaper on 25/01/2019 and site notices were displayed around the site 25/01/2019 and neighbour notification letters were sent on 18/01/2019.

49 letters have been received raising objection on the following grounds / for the following reasons:

- Concern regarding the closure of the access to the western platform (platform 1, London bound), and the impact this would have on a right of way through the station, emergency egress from this platform, and dangerous and unsuitable alternative walking route for accessing the station and Town centre without the access.
- Concern that the issues outlined above would be magnified if developments to the west, including Aarons Hill and Ockford Park in particular, go ahead.
- The application submission documents and supporting statements contain inconsistencies and inaccuracies.
- The proposed gateline would lead to queuing and frustration
- Insufficient picking up and setting down space remaining
- The existing station entrance is unsafe
- The application should be invalid as the site notice is not displayed prominently and is on a neighbours boundary.
- The proposed works do not fall within permitted development rights as Part 8 Class A excludes the development of railway stations including where the “reconstruction or alteration of a building or structure where its design of external appearance would be materially affected.”
- There is a legal right of way over the station bridge by the occupiers of the adjoining land, and for the general public as the route has been in use for in excess of 20 years.
- Residents of New Way were not given notice of the application.
- No transport assessment has been provided.
- Concern regarding the closure of the access through the listed building, and that this may not protect the long term interest of the building.
- The proposed new building would be ugly with inappropriate materials and have an adverse impact upon the station building

In support of the application the applicant has made the following points:
- The proposed works are intended to improve the operation and address the demands of the station;
- Where possible the proposed works have been designed in a manner to preserve the historical appearance of the station – the new propriety enclosure will be of modern construction, sympathetic to the precedent set by the footbridge and canopies, matching the design, profile and form whilst providing a distinct contrast to the existing station building;
- The construction techniques and equipment will ensure continuity with the character of the station and precedents set and preserve the historical appearance of the station. The proposed CCTV cameras and containment will match what is currently provided;
- All proposals are capable of later removal with minimal consequential damage to existing fabric.

Determining Issues

Impact upon the Listed Building

Planning Considerations

Impact upon the Listed Building

Section 66 of the Planning (Listed Buildings and Conservations Areas) Act 1990 states that in considering whether to grant listed building consent for any works the local planning authority or the Secretary of State 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.

Policy HA1 of the Local Plan (Part 1) 2018 outlines that the Council will ensure that the significance of heritage assets are conserved or enhanced to ensure the continued protection and enjoyment of the historic environment. Retained Policies HE3 and HE5 of the Local Plan 2002 are afforded significant weight owing to their consistency with the NPPF 2018.

The significance of the railway station is that it was built in 1859 as part of the project to extend the railway line beyond the original Godalming terminus station (near Jewsons) towards Haslemere and Portsmouth. It is built of bargate stone with ashlar dressings in a free Tudor style. It comprises the usual railway offices together with a three storey station maters house.

The proposal involves only minimal alteration to the historic fabric consisting of drilling cable routes and installing a remotely operated lock to the booking hall/platform door. This door is a modern door in an original opening. The
impact on the special interest of the building would be negligible if undertaken with appropriate sensitivity and care.

Representations have raised concern that the curtailment of the use of the booking hall as the main platform access point would result in an adverse impact on its long term retention. However, there is no proposal that this space would be removed from public use, and given the protection afforded to the building the lack of use as a through route would not represent a reason for its loss.

In light of the above, the proposal would preserve the special interest and setting of the Listed Building and would not harm its significance. As no harm has been identified, it is not necessary to weigh up the public benefits against any identified harm. The proposal would therefore be in accordance with Section 16 of the Planning (Listed Buildings and Conservation Areas Act 1990), Policy HA1 of the Local Plan (Part 1) 2018 and retained Policies HE3 and HE5 of the Local Plan 2002.

Parish/Town Council and or Third Party Representations

Whilst the views of local residents are noted and appreciated, most of the proposed works, whilst shown for information purposes on the submitted plans, fall outside of the scope of this listed building application, with most works falling within permitted development rights for railway operators. Furthermore, the Listed Building application only relates to those elements which materially impact on the historic fabric of the Listed Building, essentially the provision of cabling, installation of CCTV cameras on the building, provision of locks to the booking hall door and regrading of the tarmac adjacent to the station wall. In light of this information each of the points raised in representations is discussed below -

- Concern regarding the closure of the access to the western platform (platform 1, London bound), and the impact this would have on a right of way through the station, emergency egress from this platform, and dangerous and unsuitable alternative walking route for accessing the station and Town centre without the access. (Officer comment - It is not within the remit of this application to challenge the principle of restricting access to the station).
- Concern that the issues outlined above would be magnified if developments to the west, including Aarons Hill and Ockford Park in particular, go ahead. (Officer comment - It is not within the remit of this application to challenge the principle of restricting access to the station).
- The application submission documents and supporting statements contain inconsistencies and inaccuracies. (Officer comment – sufficiently clear information has been provided in order to allow the proper assessment of this listed building consent application)

- The proposed gateline would lead to queuing and frustration (Officer comment – this work falls within permitted development rights and is not within the remit of this application).

- Insufficient picking up and setting down space remaining (Officer comment – this work falls within permitted development rights and is not within the remit of this application).

- The existing station entrance is unsafe (Officer comment - this matter does not relate to the current application).

- The application should be invalid as the site notice is not displayed prominently and is on a neighbours boundary (Officer comment – Notification of the application by a site notice in the vicinity of the site is a legislative requirement, but to what this is affixed and whether the location is considered prominent is a matter of officer discretion. The site notice was displayed in a location with sufficient public visibility)

- The proposed works do not fall within permitted development rights as Part 8 Class A excludes the development of railway stations including where the “reconstruction or alteration of a building or structure where its design of external appearance would be materially affected.” (officer comment – The application before committee is for Listed Building Consent and whether the other works described are permitted development is not the subject of this application. However, for clarity it is noted that the proposed new building would not represent a ‘reconstruction or alteration of a building’. Whilst the proposed works do require listed building consent as they involve alterations to the historic fabric, they do not in themselves materially alter the external appearance of the building.

- There is a legal right of way over the station bridge by the occupiers of the adjoining land, and for the general public as the route has been in use for in excess of 20 years. (Officer comment – this is not a material consideration in relation to this Listed Building Consent application.)

- Residents of New Way were not given notice of the application. (Officer comment – Overton House, Bradbury House and Meath Home were notified of the application. No other addresses on New Way are considered to be adjoining occupiers of the site for the purposes of notification.)

- No transport assessment has been provided. (Officer comment – The proposal is for listed building consent and an assessment of the transportation impact of the permitted development works is not relevant to this application. There is no requirement for the applicant to provide traffic flow data to justify the works.)
Concern regarding the closure of the access through the listed building, and that this may not protect the long term interest of the building. (Officer comment - this matter is material to the determination of the application and is discussed above).

- The proposed new building would be ugly with inappropriate materials and have an adverse impact upon the station building (The proposed new building would be constructed under permitted development rights and this is therefore not a material consideration in relation to this application.)

Conclusion

Officers consider that there are no adverse impact that would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.

Recommendation

That consent be GRANTED subject to the following conditions:

1. Condition
   All building works, finishes and making good, both internal and external, shall match the relevant existing work in respect of method, detail, and finished appearance unless otherwise approved in writing by the Local Planning Authority.
   
   Reason
   To preserve the special interest of the Listed Building in accordance with Policy HA1 of the Local Plan Part 1 2018, and Saved Policies HE3 and HE5 of the Local Plan 2002.

2. Condition
   No new duct work, conduit or the like shall be fixed to the surface of the historic building fabric other than as shown on the drawings hereby approved or as otherwise agreed in writing with the local planning authority.
   
   Reason
   To preserve the special interest of the Listed Building in accordance with Policy HA1 of the Local Plan Part 1 2018, and Saved Policies HE3 and HE5 of the Local Plan 2002.
3. **Condition**
All drilling and cutting for service routes should be carefully and neatly undertaken to minimise damage to the historic fabric.

**Reason**
To preserve the special interest of the Listed Building in accordance with Policy HA1 of the Local Plan Part 1 2018, and Saved Policies HE3 and HE5 of the Local Plan 2002.

4. **Condition**
The plan numbers to which this permission relates are 226938-FCG-GO-00-DR-100; 200; 2001; 2002; 2007; 2009; 2010; 2200; 2202; 2204; 2205; 2206; 2207 (all P01) and Heritage Design and Access Statement reference 226938-FCG-B-HeritageDAS-GO-FIN-V1.1. The development shall be carried out in accordance with the approved plans. No material variation from these plans shall take place unless otherwise first agreed in writing with the Local Planning Authority.

**Reason**
In order that the development hereby permitted shall be fully implemented in complete accordance with the approved plans and to accord with Policy TD1 of the Local Plan 2018 (Part 1) and retained Policies D1 and D4 of the Local Plan 2002.

**Informatives**

The Council confirms that in assessing this application it has worked with the applicant in a positive and proactive way, in line with the requirements of Paragraph 38 of the National Planning Policy Framework 2018.