

# Proposed Replacement Gwent Police Operational Facility

Planning Statement

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# 1. Introduction and Background

This Planning Statement is prepared by The Urbanists Ltd. on behalf of Gwent Police and Willmott Dixon Construction. It accompanies the full planning application for the proposed redevelopment of the former Gwent Police Headquarters site, Turnpike Road, Cwmbran for a new police operational facility. The former buildings at the site and a wider area to the north were approved in 2012 for demolition, which has only been implemented in respect to the wider area and not the site.

A pre-application advice request with regard to the proposed development was submitted in April 2023, and is due to be concluded shortly. An application for fencing to secure the site has also been applied for, in June 2023, and is due to be determined.

This document sets out details of the site, the development proposals, legislative and planning policy context and assesses the proposals against this context.

## 2. Site and Development Description

### 2.1. Site Background

The site is located in the Croesyceiliog and Llanyrafon area of east Cwmbran, approximately 1.5 miles from Cwmbran Town Centre and 5 miles from Newport City Centre, within the administrative area of Torfaen County Borough Council.

The site is the existing Gwent Police Operations site, as identified on the aerial image below. It is roughly triangular in shape (inverted) comprising some 4 ha. It is bordered to the east by Croesyceiliog Bypass road (A4042 dual carriageway), and Turnpike Road follows its western boundary. Land adjoining to the north of the site is a vacant development site (the former County Hall buildings). Surrounding land uses in the area are residential, and education (further to the north west). The site location is shown on the aerial image below (figure 1), although note that the actual development application boundary is shown in the Design Statement and the submitted plans.

The land inclines gently upwards from Turnpike Road to the bypass, and is currently occupied by the former Gwent Police headquarters buildings, parking, circulation, access and landscape. Access to / from the site is from Turnpike Road.

Figure 1: Aerial view of site - site location (image: Google Earth)



## 2.2. Planning History

The following approved planning applications are relevant to the proposed site.

- Demolition of former County Hall & Police buildings, land reprofiling & ecological mitigation works. Ref. No: 12/P/00326 Approved 23/11/2012

The application site, and the wider area land adjoining to the north, were included in a full planning permission for demolition as set out below. Only the wider land to the north (former County Hall site) was implemented, following the discharge of conditions.

- Construction of 143 dwellings with drainage, car parking, open space, landscaping, access and associated works. Ref. 18/P/00798/FUL Approved 27/05/20

The land adjoining to the north of the development site now has full planning permission for residential development as shown on the site layout plan below in Figure 2.

Figure 2: Approved residential development adjacent to site (18/P/0798/FUL)



### 2.3. Proposed Development

It is proposed to redevelop the land for the new Gwent Police Operational Facilities. The proposed development comprises the following uses, which will cover approximately 10,976 sq m, and the proposed layout and design of which is set out in the accompanying Design Statement:

1. Police Station and office accommodation (approx. <2,000 sq m, 2 storey);
2. 50 cell custody suite with associated offices (approx. <4,000 sq m, 2 storey);
3. Vehicle Workshop (1,708 sq m, 2 storey);
4. Training facilities (3,298 sq m, 2 storey); and,
5. Secure site means of enclosure.

The scheme also includes areas for staff, visitor, and police vehicle parking, vehicular circulation, and landscape works.

It is anticipated that the site will be developed in two stages:

1. Vacation of remaining buildings, construction of temporary secure means of enclosure; and,
2. Demolition works and construction of the new facility.

The separate planning application (Ref. 23/P/0389/FUL) for temporary means of enclosure is already submitted and proposed to secure the site whilst it is unoccupied to prevent unauthorised access.

Details relating to the demolition works have been included within this application, while construction details could be secured post-planning approval by way of a planning condition.



Figure 3: Proposed redevelopment layout for the Gwent Police Operational Facility

### 3. Planning Context

This section sets out the relevant planning policy context for the proposed development, covering the national and local contexts.

#### 3.1. National Planning Context

National planning policy is contained within the eleventh edition of Planning Policy Wales (PPW), published by the Welsh Government in February 2011. PPW is supported by 21 topic-based Technical Advice Notes (TANs), some of which are also relevant.

Planning Policy Wales is the principal planning policy document of the Welsh Government that should be taken into account in the preparation of development plans and in the determination of planning applications and appeals.

The main thrust of PPW is to promote sustainable development by ensuring that the planning system provides for an adequate and continuous supply of land available and suitable for development.

#### Planning Policy Wales (Edition 11, 2021)

Planning Policy Wales (PPW) is the Welsh Government's land use planning policy for Wales. The primary objective of PPW is to ensure the planning system contributes towards the delivery of sustainable development, and improves the social, economic, environmental and cultural well-being of Wales, as required by the PWA and Wellbeing Act.

The role of PPW is to establish the key principles for the planning system. It forms part of the Planning Framework for Wales and as a material consideration, has substantial weight in the planning process. It adopts a placemaking approach to plan making, planning policy and decision making.

PPW describes the process of placemaking as an *“inclusive process, involving all of those with a professional or personal interest in the built and natural environment, which focuses on developing plans, making decisions and delivering developments which contribute to the creation and enhancement of sustainable places”* (par. 2.6) and it *“...is a holistic approach to the planning and design of development and spaces, focused on positive outcomes.*

*It draws on an area’s potential to create high quality development and public spaces that promote people’s prosperity, health, happiness, and well being in the widest sense”* (p.14).

It sets out the key planning principles of ‘achieving the right development in the right place’ by the principles of:

- Growing our economy in a sustainable manner
- Making best use of resources
- Facilitating healthy and accessible environments
- Creating and sustaining communities
- Maximising environmental protection and limiting environmental impact.

These are then underpinned by National Sustainable Placemaking Outcomes in relation to each principle.

It also sets out the four key themes which contribute to placemaking thus:

- Strategic and spatial choices, including how to achieve good design that enables access and inclusivity, environmental sustainability and respect for local character; and healthier places, including enabling opportunities for outdoor activity and recreation.
- Active and social places, including encouraging the multiple use of open space and facilities, where appropriate, to increase their effective use.
- Productive and enterprising places, including the promotion of healthy lifestyles, and physical and mental health and wellbeing, provision of integrated green infrastructure and resilience to climate change.
- Distinctive and natural places, including the need to conserve and enhance the historic environment and its assets; protecting and enhancing green infrastructure assets and the protection and enhancement of biodiversity; protection of trees and woodland where they contribute towards the ecological, character or green infrastructure functionality of an area; and to integrate Sustainable Drainage Systems to minimise flood risk and maximise other benefits.

The first consideration is how the proposals contribute towards strategic and spatial choices; then how they contribute towards active and social places, productive and enterprising places and distinctive and natural places. The outcomes of this process should result in a proposal which contributes towards a sustainable place and achieving the well-being goals and sustainable placemaking outcomes.

### Future Wales: The National Plan 2040

Future Wales - The National Plan 2040 was adopted in February 2021 as the national development framework setting the direction of development in Wales to 2040. The NDF provides a strategy to address key national priorities through the planning system, including developing a vibrant economy, developing strong ecosystems, achieving decarbonisation and climate-resilience and improving the health and wellbeing of communities.

It sets out 11 outcomes of Future Wales comprising the vision for Wales in 2040. The aim is for a Wales where people live:

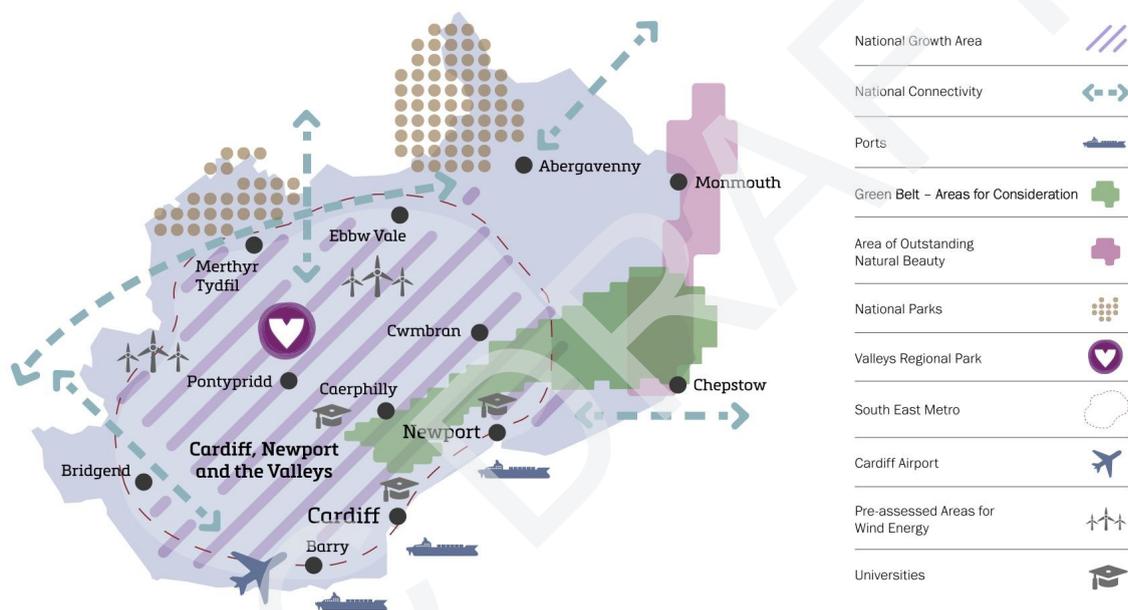
- in connected, inclusive and healthy places;
- in vibrant rural places with access to homes, jobs and services;
- in distinctive regions that tackle health and socio-economic inequality through sustainable growth;
- in places with a thriving Welsh Language;
- in towns and cities which are a focus and springboard for sustainable growth;
- in places where prosperity, innovation and culture are promoted;
- in places where travel is sustainable;
- in places with world-class digital infrastructure;
- in places that sustainably manage their natural resources and reduce pollution;

- in places with biodiverse, resilient and connected ecosystems; and
- in places which are decarbonised and climate-resilient.

Future Wales divides Wales into 4 regions with Torfaen falling within the South-East Region, as covered by the Regional Strategic Diagram below. It shows that Cwmbran is included within the national growth area.

Figure 4: South-East Region Strategic Diagram (p.164)

#### Regional strategic diagram



Future Wales also provides a series of national policies (ch.4, Strategic and Spatial Choices), including:

#### Technical Advice Notes

The planning policies set out within Planning Policy Wales (Edition 11, 2021) are supplemented by a series of topic based Technical Advice Notes (TANs), which provide detailed planning advice on specific matters.

PPW is supported by 21 Technical Advice Notes (TAN's) which provide more detailed guidance on a variety of issues. In respect of this application, the following TAN's are considered to be of relevance.

Technical Advice Note 5 (Nature Conservation and Planning) - TAN5 offers national guidance on how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. The guidance indicates that biodiversity conservation and enhancement is an integral part of planning for sustainable development. The guidance advocates a collaborative approach where LPAs, developers and key stakeholders in conservation should work together to deliver sustainable development.

Technical Advice Note 12 (Design) - TAN12 offers national guidance on design and advocates that good design is not inevitable. It requires a collaborative, creative, inclusive, process of problem solving and innovation – embracing sustainability, architecture, place making, public realm, landscape and infrastructure.

It identifies that the public sector has a responsibility and opportunity to set high standards in achieving good design in its own buildings. Going onto recognise that the: *“innovative design of public buildings can act as a powerful regenerative tool and the potential for social and economic benefits associated with the design of ‘flagship’ public buildings should not be underestimated.”* (par.5.10.1)

Technical Advice Note 18: Transport (2007) - TAN 18 offers national guidance on transportation related planning policies and advises that it should be read in conjunction with Manual for Streets.

### 3.2. Local Policy

#### Torfaen Local Development Plan 2013 - 2021

The statutory development plan for this site is the Torfaen County Borough Council Local Development Plan (LDP) which was adopted in December 2013. This is supported by a number of topic specific supplementary planning guidance (SPG).

The site and the surrounding area is allocated as a Strategic Housing site under LDP Policy H1/1 - 'County Hall and Police HQ, Llanyafon' as shown in Figure 5 below. It was included in the allocation having regard to an outline planning application for residential use (ref. 13/P/00152) which was being considered at the time for the entire area. It was anticipated at that time that the Police HQ would close in 2014, and the site would be developed for residential use in 2015 / 16 for 60 units. The application however was withdrawn, and so the site does not have planning permission for residential use. The policy nevertheless allocates the land as part of a wider allocation for 220 residential units. The planning permission for the adjoining land covers 143 units leaving a balance of 78 units.

The area is also designated as a Site of Importance for Nature Conservation under Policy BG1 'Locally Designated Sites for Biodiversity and Geodiversity'. The policy makes a presumption against development proposals which would have significant adverse effects unless it can be demonstrated that: the development could not reasonably be located elsewhere and the benefits of the proposed development justifiably outweigh the nature conservation or geological value of the site; and adequate mitigatory and / or compensatory provision is made which is proportionate to; or an enhancement to the value of the ecological resources that are lost.

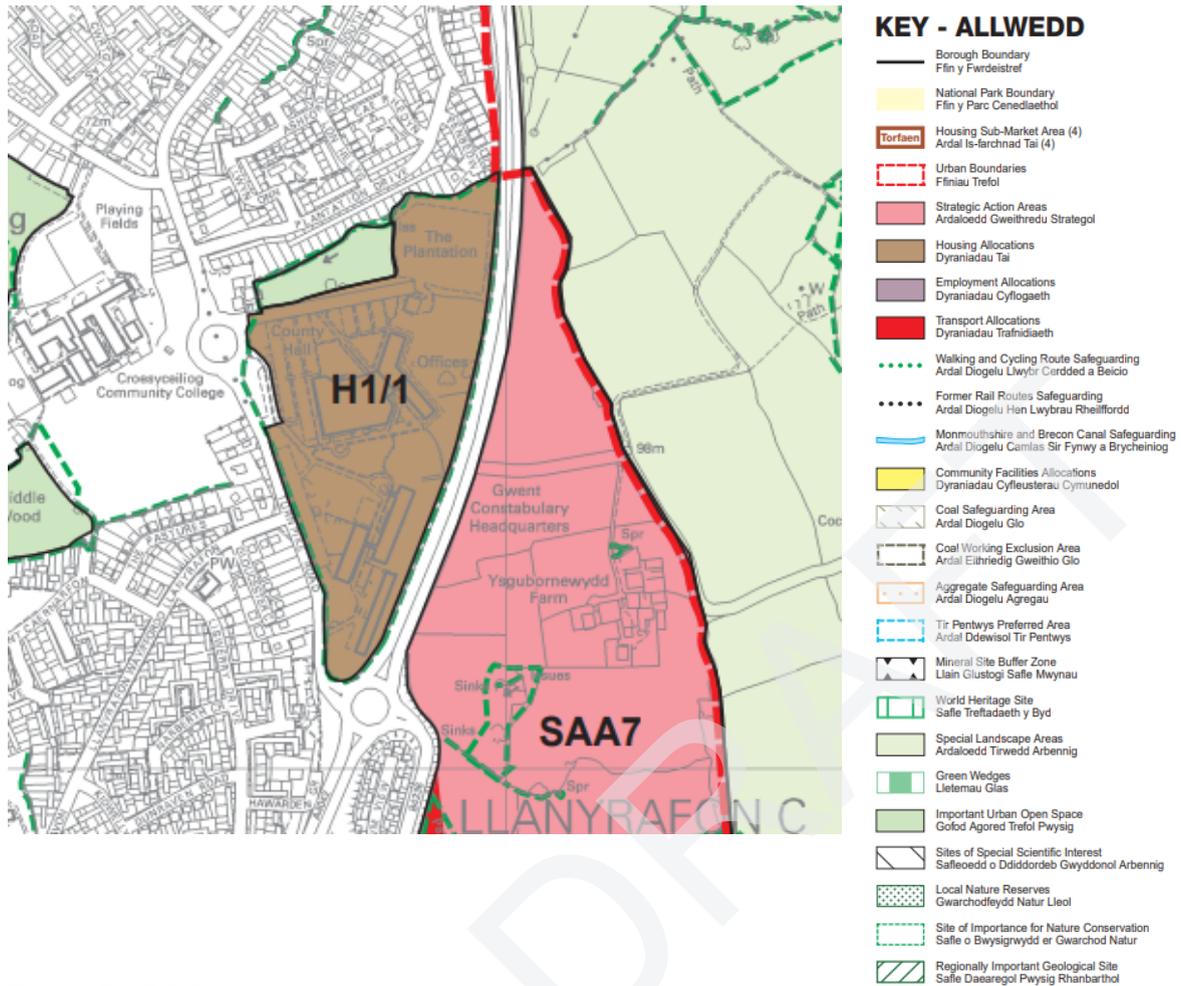


Figure 5: LDP Policy Map extract

Land further to the east of the site is allocated as a Strategic Action Area under policy SAA7 ‘Llanfrechfa Grange’. This allocates some 44ha of land for Specialist and Critical Care Centre Hospital, approximately 300 dwellings, 4.8 hectares of associated employment land (healthcare related uses), community facilities, playing pitch provision, children’s play areas and public open space.

The only factor that is identified on the LDP Constraints Map relating to the development site is a small area of surface water flooding within the site. This will be addressed in the Drainage Strategy which is submitted with the redevelopment planning application.

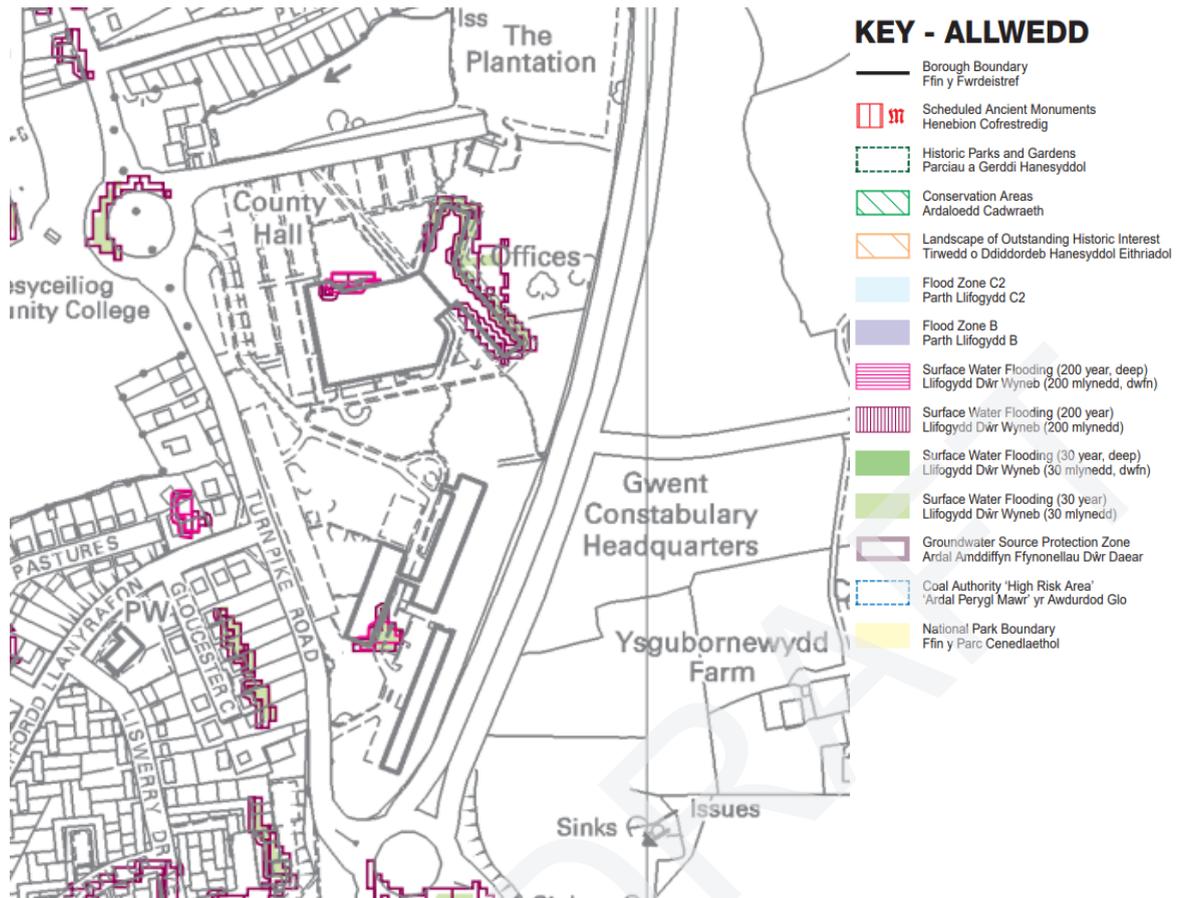


Figure 6: LDP Constraints Map extract

Other key policies of the plan which are relevant to the proposed development include the following:

<b>Strategic Policy</b>	<b>Policy Context</b>
Policy S1 - Urban Boundaries	Allow for development which would: a) contribute to the creation and maintenance of sustainable communities in accordance with the LDP Strategy; and b) Define the urban area, within which there is a presumption in favour of development, taking into account material planning considerations.
Policy S2 - Sustainable Development	The Council will expect development proposals to promote the above principles as this will encourage sustainable development and resource use. New development should normally be located within the urban boundaries to make best use of existing infrastructure,

	services and amenities with good access to existing local facilities and public transport.
Policy S3 - Climate Change	<p>Development proposals shall seek to mitigate the causes of further climate change and adapt to the current and future effects of climate change; and will be supported where they demonstrate consideration of the following hierarchy of criteria (where appropriate):</p> <ul style="list-style-type: none"> <li>• a) Ensuring that locational decisions are sustainable and avoid areas susceptible to flooding unless justified by national planning policy;</li> <li>• b) Achieving Sustainable Design to ensure residual energy requirements are minimised through: - i) Supporting climate responsive development through location, orientation, density, layout, built form, materials and landscaping; ii) Reducing surface water run-off and flood risk through the use of Sustainable Urban Drainage Schemes (SUDS) unless it is shown that these measures are uneconomic or impractical; iii) promoting water efficiency through reduced demand; and iv) exploring opportunities to maintain habitat connectivity through green infrastructure.</li> <li>• c) achieving energy efficiency in development in line with national standards (where required); and</li> <li>• d) utilising renewable, low, or zero carbon energy technologies to generate heat and electricity.</li> </ul>
Policy S4 - Place Making/ Good Design	<p>Proposals for all new development must have full regard to the context of the local natural and built environment and its special features through: a) Promotion of local distinctiveness by sympathetic design, material selection and layout including public art; b) Delivering a mix of uses to complement existing facilities and aim to address local deficiencies; and c) Ensuring that location and layout integrates and contributes to local accessibility.</p>

Policy S6 - Employment and Economy	- The LDP provides a range of accessible employment opportunities for the residents of Torfaen throughout the County Borough, with allocations provided within the Blaenavon / North Torfaen, Pontypool and Cwmbran areas. Sites will be sustainably located and accessible by a range of public transport modes.
Policy S7 - Conservation of the Natural and Historic Environment	- Development proposals should seek to ensure the conservation and enhancement of the Natural, Built & Historic Environment of Torfaen, in particular: a) Biodiversity resources; b) Geodiversity resources; c) Water environment; d) Landscape setting; e) Character of the built environment; and f) Historic assets.
<b><u>Borough Wide Policy</u></b>	<b><u>Policy Context</u></b>
BW1 - General Policy – Development Proposals	All development proposals will be considered favourably providing they comply with the following criteria where they are applicable: - <ol style="list-style-type: none"> <li>1. Amenity and Design</li> <li>2. Natural Environment</li> <li>3. Built Environment</li> <li>4. Design and Transport</li> </ol>
Strategic Housing Sites H1/1	Strategic housing sites are defined as sites that are able to accommodate 100 or more dwellings. The location and scale of these sites present an opportunity for significant new development to take place across the County Borough and they form an essential part of the LDP Development Strategy in order to meet housing requirements in the County Borough.

#### Supplementary Planning Guidance (SPGs)

SPG documents add further detail to the policies in the local development plan. They can be used to provide further guidance for development, on specific sites or on particular issues such as design. The only SPG's relevant to this development is: Annex 5 Biodiversity, Geodiversity and Ecological Resilience. This SPG is of interest due to the site being designated as a Site of Nature Conservation Interest (SINC) and the potential for financial

contributions to be required; where a development does not adequately avoid, reduce, mitigate, compensate or provide new benefits to result in a net biodiversity benefit.

### Replacement LDP 2018 - 2033

The call for candidate sites took place in 2018 and again late 2020/early 2021. Work is currently underway on the Deposit plan, which could be issued later in 2023. A revised version of the LDP delivery agreement is currently being prepared, having regard to the delays caused by Covid.

### 3.3. Planning Assessment

This section considers the scheme against the relevant planning policy, where it is applicable. Planning applications must be determined in accordance with the adopted development plan unless material considerations indicate otherwise. This requirement is set out in the Planning and Compulsory Purchase Act 2004 (Sec.38(6)). Further to this is the requirement that a local planning authority in Wales, when carrying out a function in relation to an application for planning permission, must exercise that function for the purpose of ensuring that the development and use of land contribute to improving the economic, social, environmental and cultural well-being of Wales (Planning (Wales) Act 2015).

The proposed development is similar to the previous use of the site in regard to being used for police activities. It comprises the proposed demolition and construction of new buildings, facilities, and accesses. Design refinement and improvements have been made as part of the early stage planning processes, as explained in the Design and Access Statement to accompany this full planning application.

Pre-application advice has sought, received and reviewed, and those policies highlighted as likely relevant have been reassessed again in the context of the final proposed scheme.

It is considered that the scheme, as now proposed, meets the requirements of the key and other LDP policies as set out in the summary table below:

Policy	Assessment Summary
Policy S1 - Urban Boundaries	<p>The location of police services, nearby local communities, is paramount to their work in protecting them. The specific location of this proposed development is at the urban boundary edge, in previously developed land. Proposed development is therefore sited at the extreme of what is sensible while also limiting the likelihood of any potential conflict with other community land uses. The bypass A-road infrastructure adjacent to the site further adding to the suitability of the proposed services being sited in this location, reducing time needed to reach the site or destinations from it.</p>
Policy S2 - Sustainable Development	<p>The proposed development not only lies within the urban boundary, but would make use of a previously developed site, and nearby important transport connections that are relevant to the site's proposed use for fleet vehicle maintenance. The site is located on existing public transport routes. The proposed development is therefore in a highly efficient and sustainable location, relative to the proposed use, and convenient for the site's users to access by public transport.</p>
Policy S3 - Climate Change	<p>The proposed development is a modern building design and therefore of a much greater efficiency than the structures it replaces. By constructing a new facility for the proposed uses, modern energy and efficiency standards have been built into the design, and would save carbon in its use. The needs for SuDS and consideration of the building's design in regard to other passive climate response features has taken place, and been proposed.</p>

<p>Policy S4 - Place Making/ Good Design</p>	<p>The design has full regard to the context of the site and its previous uses. It also has regard to the local needs of police facilities to serve the public's needs and address local deficiencies. As already set out above, the location and layout integrates and contributes to local accessibility for site users, as it has under the previous similar use. The proposed development is an example of good place making and good design.</p>
<p>Policy S6 - Employment and Economy</p>	<p>While the land doesn't lie within or contribute to the identified land for employment and economic development, its services are supportive of all allocations in the locality. Employment opportunities are likely to be for those not situated in the immediate area around the proposed development site due to security issues. However, employment opportunities would be secured for the wider locality, including highly skilled mechanical roles that would be a prerequisite of the proposed development's use. There would therefore be a wider local direct benefit from the proposal and a secondary indirect benefit to immediately surrounding areas, through staff use of the site and nearby local services. The additional benefit of security the site's would be experienced the most in adjacent areas, but would be of a significant benefit to businesses more widely.</p>
<p>Policy S7 - Conservation of the Natural and Historic Environment</p>	<p>The proposed development considers and accounts for the site's designation as a site of importance for Nature conservation (SINC). The development seeks to ensure that the ecological value of the site is at least maintained, with any potential impacts being mitigated for and enhancement aimed for. The site is not</p>

	considered to hold any significant other values which relate to this policy.
<b><u>Borough Wide Policy</u></b>	<b><u>Policy Context</u></b>
BW1 - General Policy - Development Proposals	The proposed development should be considered acceptable based on the proposed designs consideration of: amenity and design in the layout, scale, and styling of the proposed building and its landscaping, extending to a favourable benefit for the natural environment overall, and contributing favourably to the areas built design, also accounting well for transport.
Strategic Housing Sites H1/1	The allocation which includes both the site and a wider area looks to address a need for 220 dwellings of which 143 dwellings are to be catered for within the wider area (as approved. While there is a minor shortfall in the projected and the proposed dwelling numbers for the allocation overall, the shortfall is not considered significant. The reuse of the existing site for a new public service facility is seen to be an appropriate balance to the impact on dwellings possible at the allocation. Changes often occur between allocation and built out of sites, and the variance in dwelling numbers would not be considered unusual as part of any allocation.

## 4. Conclusion

The proposed development is shown in plans and documents submitted as part of the full planning application as being aligned with the relevant local development plan policies, as well as national policy, guidance, and legislation. The development would be in line with the current permitted use of the site, with only a change in the form of the buildings and specific facilities available to the site users. The development would bring a sensitive and efficient redevelopment

of the site and is in a sustainable location for it. Given the need for the proposed services regionally, the proposed development would have a wider benefit than the site; while still being advantageous for quickly responding to local resident needs.

Overall, the proposed development would provide needed services for the local police service, in a manner that is compliant with all planning policy and legislation, and would have some benefit to the local area, while maintaining the general use of the site as extant planning permission already approves.

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