



## PLANNING STATEMENT

**Full Planning Application for a Modern Manufacturing Facility | November 2020**

**Grange Road, Cwmbran, NP44 3XX**

*On behalf of Cedar Cwmbran Ltd*

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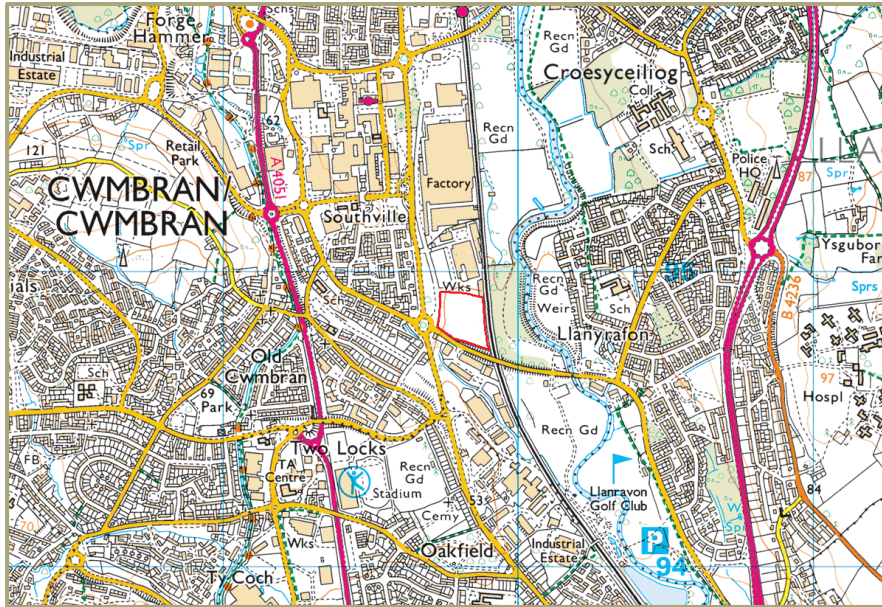
## 1.0 Introduction

- 1.1 This Planning Statement has been compiled in support of Cedar Cwmbran Ltd's application for Full Planning Permission for a replacement circa 10,000m<sup>2</sup> modern manufacturing facility to be occupied by Crane Process Flow Technologies Ltd (hereinafter referred to as Crane) to secure the future of presence in the town together with 170 jobs. The site comprises brownfield industrial land at Grange Road, Cwmbran.
- 1.2 This Statement provides a description of the application site, its setting, context and planning history together with detail on the proposed development and its economic importance. The Statement also explains how the proposed development is in accordance with the relevant policies of Planning Policy Wales Edition 10 (PPW), its associated Technical Advisory Notes and any local guidance. The policies of the adopted Torfaen Local Development Plan are also examined.
- 1.3 A letter, written on behalf of Crane has been submitted separately in support of this application in which the principal drivers for the proposed development have been discussed. The importance of this proposed development in terms of its economic benefits is unquestionable, and therefore this Planning Statement should be read in conjunction with that letter, in addition to the other separately submitted supporting documents.



## 2.0 Site Location and Context

- 2.1 The site is located at Grange Road, Cwmbran (ST29823 94851 | E:329823 N:194851) as identified in figures 1 and 2 below.



**Figure 1 (left)**

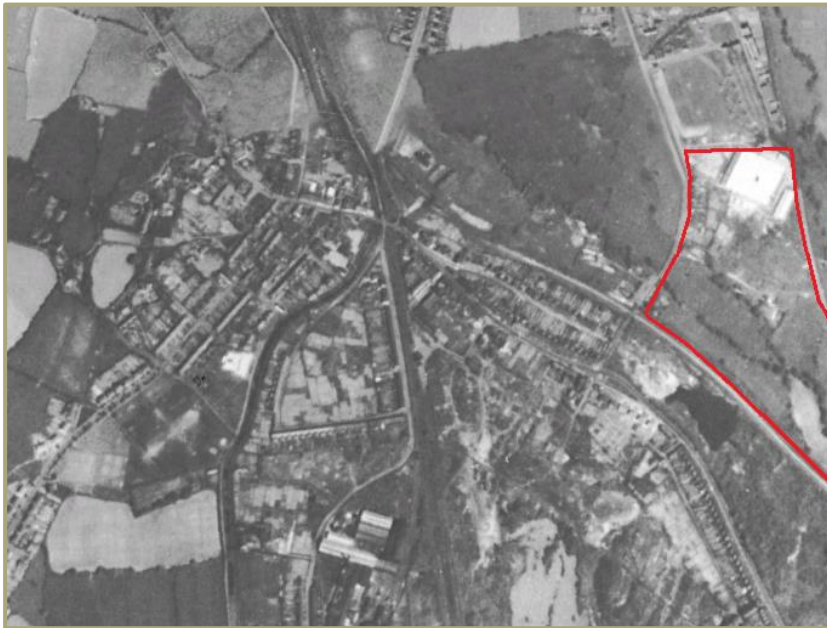
The site outlined in red extracted from the Ordnance Survey showing the site's location in Cwmbran.



**Figure 2 (left)**

An aerial image of the site in 2020 having been cleared and levelled.

- 2.2 Historically, the site has been subject to industrial development since at least 1945, prior to the wider development of Cwmbran itself in the early 1950s, as shown in figures 3 and 4 below.



**Figure 3 (left)**

An aerial image from 1945 preceding the area's wider development and showing a form of industrial development on the site's northern half. To the immediate north and lying adjacent is the applicant's current premises, occupied since 1934.



**Figure 4 (left)**

By 2001 the site's industrial use is well established, being subsumed into the area's wider development.



- 2.3 By 2004, it is understood that the site was occupied by a machine shop and packing and distribution warehouse which was then demolished and removed leaving a bare site. The final areas of hardstanding were removed in 2014.
- 2.4 The site has now been vacant since 2004 despite attempts at regeneration, and today stands as a vacant plot close to Cwmbran's town centre and situated adjacent to industrial and commercial uses to the north and south, residential development to the west and a railway line to the east.
- 2.5 The development site measures approximately 2.85 ha, is broadly level with a slight slope to the south and an AOD of circa 50m. The site is laid to rubble aggregate, with a crushed stone bund running along its boundaries, and a large crushed stone stockpile situated at its north western corner.
- 2.6 The site is unattractive waste in an otherwise well-presented locale and offers negative amenity value to surrounding residences. It stands as an unattractive entrance and poor introduction to Cwmbran's town centre and requires remediation. (Refer to the photos contained as figures 5-10 below)

**Figures 5-10**

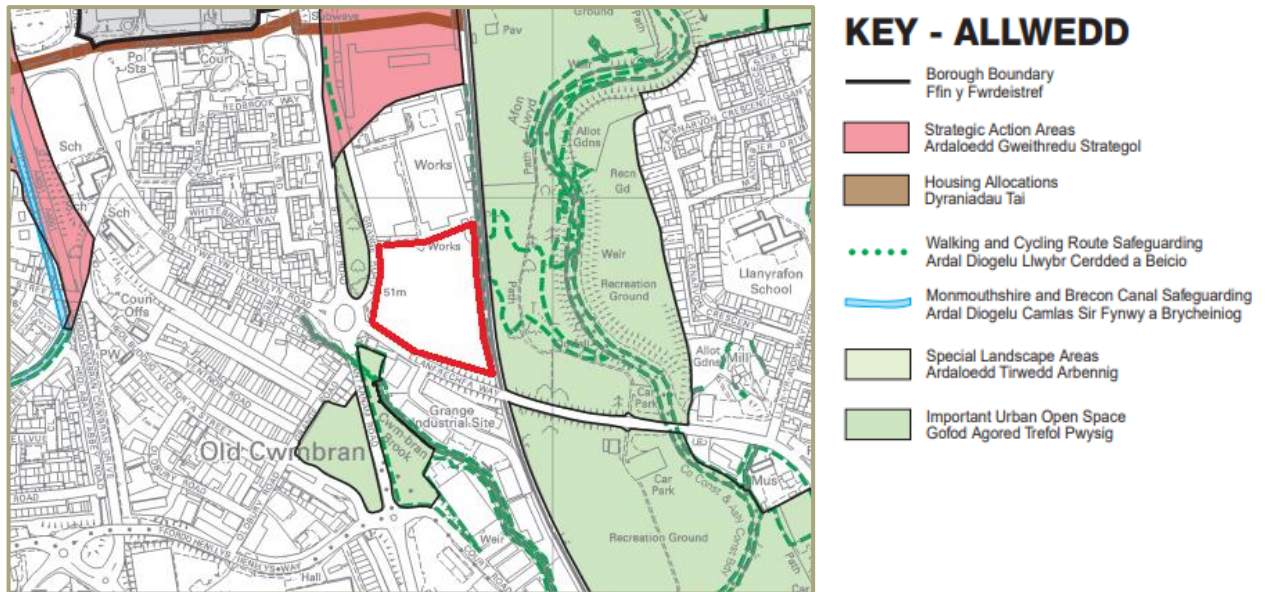




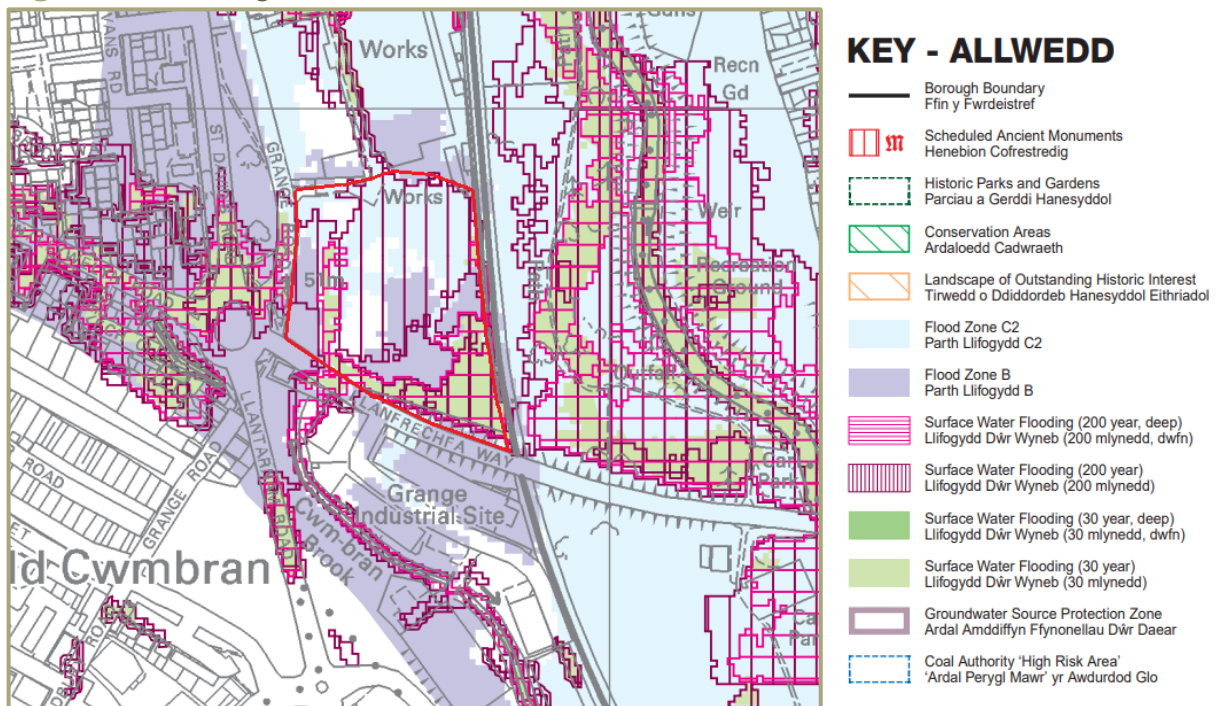
## CONSTRAINTS / OPPORTUNITIES

- The site is not located within any Conservation Area, near to any listed buildings or other statutorily protected areas of conservation.
- There are no third party rights of access nor Public Rights of Way crossing the site save those of the adjacent pavements and public roads.
- The nearest dwellings are located adjacent to St David's Road approximately 80m to the west, with a further small cluster to the south west of the site on the other side of Llanfrechfa Way, approximately 25m from the site's southwestern-most boundary.
- The site has not been identified as having any statutory ecological significance, though an ecological survey has been submitted in support of this application with its conclusions discussed below in this report.
- The Welsh Marches Line runs adjacent to the site's eastern boundary. Cwmbran Station lies to the north, approximately 15 minutes on foot.
- The site has been identified as having a degree of risk from fluvial and surface water flooding. Investigations quantifying risk in this location together with the creation of suitable mitigation strategies have been undertaken by Hydrock with their investigations submitted in support of this application. Their conclusions are discussed below in this report.
- The site benefits from two access points suitable to commercial and industrial traffic.

**Figure 11** Extracted from the Adopted Torfaen Local Development Plan Proposals Map showing the site not included within any specific development proposal.



**Figure 12** Showing flood risk





- 2.7 Figure 12 above identifies the land to be partially located within Flood Zone C2, Flood Zone B, and to have the potential to be affected by surface water flooding. The potential of the proposed development to be affected by flood water has been the subject of extensive investigation by Crane with a full Flood Risk Analysis and mitigation strategy submitted in support of this application, with its conclusions discussed more fully below in this report.

## PLANNING HISTORY

- 2.8 There are no extant permissions, however the site's planning history is outlined as follows:

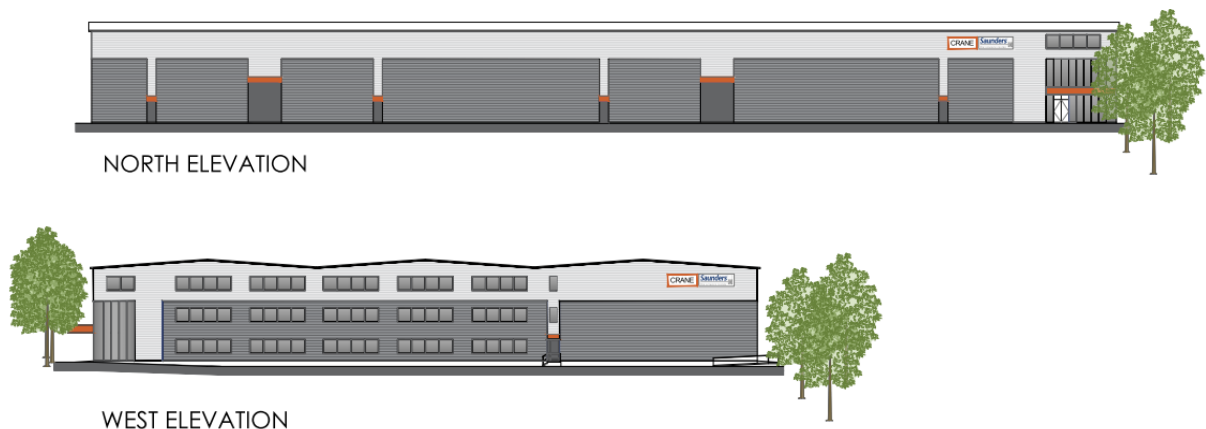
- 00/P/04008  
New compressor house  
**Approved 24<sup>th</sup> May 2000**
- 02/P/07593  
Demolition of all buildings, construction of A1 bulky goods retail unit, external storage and garden centre, service yard and parking  
**Withdrawn 26<sup>th</sup> September 2005**
- 04/P/11108  
DIY Retail Store with associated garden centre, external materials storage area, service yard and car parking  
**Approved 20<sup>th</sup> January 2005**
- 07/P/15073(E)  
Erection of approximately 300 residential units comprising of a mix of apartment (sic)  
EIA Screening application only  
**Determined as no EIA required 25<sup>th</sup> April 2007**
- 07/P/00269(E)  
Application under S73 (*ref 04/P/11108*) for the erection of DIY Store with associated garden centre, external materials storage area, service yard and car parking without complying with Condition 2 on planning permission 04/P/11108. (*Condition unknown*).  
**Approved 10<sup>th</sup> October 2007**

- 08/P/00628(E)  
Variation of condition 2 of Planning Permission 07/P/00269(E)  
**Approved 17<sup>th</sup> December 2008**
  
- 10/P/00093 (E)  
Variation of condition 2 of PP 08/P/00628(E) – Submission of details and commencement of development in relation to DIY retail store with associated garden centre.  
**Approved 20<sup>th</sup> May 2010**
  
- 16/P/01111/FUL  
Redevelopment comprising the following elements:  
a) Family pub and associated beer-garden, children’s play area, car parking and access (Full Application) b) Restaurant with drive-through lane, access and car parking (Full Application) and c) Employment buildings for B1, B2 or B8 use with associated access, car parking and servicing (Outline with all matters reserved except for access)  
**Withdrawn 29<sup>th</sup> January 2018**

## 3.0 Proposed Development

- 3.1 Crane has occupied its existing site on Grange Road since 1934. The site is now ageing and no longer appropriate for a modern manufacturing facility, nor does it provide acceptable working conditions for its circa 170 employees. The proposed development will be a world class manufacturing facility of modern design incorporating office areas, yards and parking for colleagues. A full set of drawings have been submitted in support of this application and summarised below.

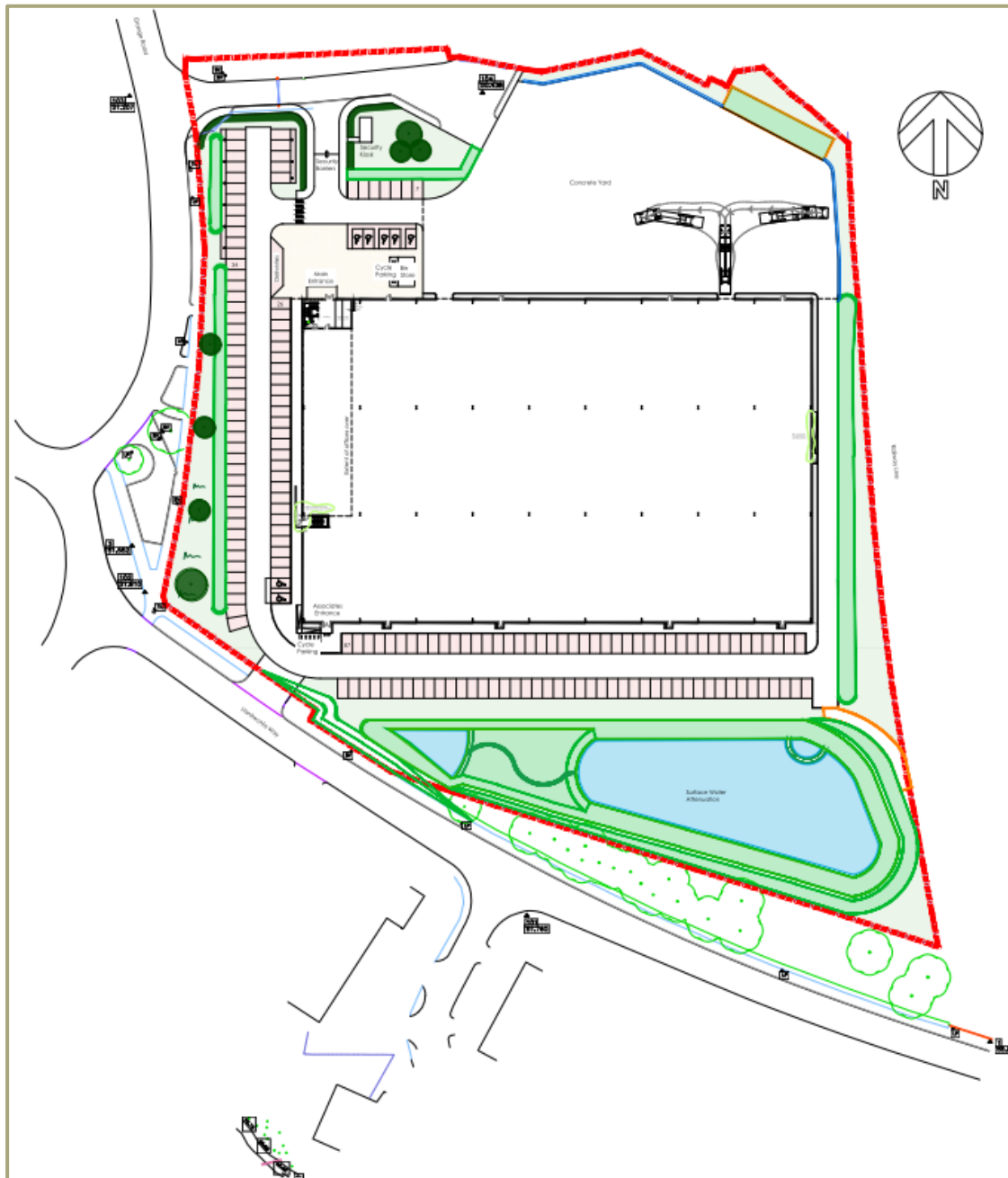
**Figure 13**



- 3.2 The industrial unit will have a gross internal area of 10,145m<sup>2</sup> of which the production area will comprising 8361m<sup>2</sup> and the remainder being formed of an undercroft and office elements.
- 3.3 Construction will be of steel portal frame clad in steel trapezoidal sheeting, with glazing to the western elevation.
- 3.4 The development will incorporate a soft landscaping scheme together with parking for 178 cars, 7 of which will be accessible and 17 ULEV.
- 3.5 Working hours will be based upon a multi-shift arrangement as current.
- 3.6 Movements from goods vehicles will be located predominantly to the northern elevation, away from domestic areas in the vicinity.
- 3.7 Figure 14 below shows the proposed layout.



Figure 14



## 4.0 Drivers for Development and Pre-Application Discussions

- 4.1 A short term extension to continue to lease the existing premises has been agreed while Crane sources a suitable alternative site. Facilities all over the world have been considered by the company, but the preferred option is to remain in Cwmbran through the construction of a new 10,145m<sup>2</sup> world-class facility – the subject of this proposed development as described above.
- 4.2 At present, the existing Cwmbran site is the global headquarters for the Saunders brand (Crane's parent company) with Cwmbran leading the brand's global research and development activities while providing at least 170 local jobs. 80% of these positions are filled by people resident in Cwmbran as well as surrounding areas including Pontypool, Blaenavon, Blaenau Gwent and Merthyr Tydfil. The jobs provided by Crane are highly desirable and cover engineering, manufacturing, sales and business support. Should the proposed development be approved, as well as providing for further employment opportunities, existing local supply jobs will be safeguarded for the future.
- 4.3 The Company's last reported sales were £35.9 million for the year ending December 2018 and the Company spent in the region of £7 million in 2019 procuring from local Welsh suppliers, particularly for high quality engineered components and manufacturing services. The firm has a strong ethos of local social responsibility, making philanthropic contributions to local charities and building long term relationships with local colleges and universities. The company's base in Cwmbran has established close links with both the University of South Wales and Swansea University, recruiting chemical engineering, supply chain and IT graduates while also provided opportunities for paid internships, sponsorship for undergraduate engineering students and an apprenticeship programme.
- 4.4 Crane has received encouragement and support from the Welsh Government and Torfaen County Borough Council, and plans have now been developed that seek to retain the Company's activities in Cwmbran. The Company's owners have recently approved a multi-million pound investment in the new facility **subject to local support and planning consent.**

- 4.5 The proposed facility has been designed to provide a high quality, safe and energising location for the company's employees and will include a number of energy-saving initiatives to safeguard and future proof ongoing efficient operations as well as making provision for future expansion.

## PRE-APPLICATION DISCUSSIONS

- 4.6 This proposal was submitted to the local authority for discussion in January 2020.
- 4.7 The local authority's initial conclusions were supportive of the proposed development, stating that:

*"The site is located within the designated Urban Boundary and therefore the principle of an industrial development is acceptable in accordance with LDP Policy S1 (discussed below) subject to other plan requirements and detailed development management considerations including amenity (including noise), design, highway safety, contamination risk, flood risk, landscape, ecology and drainage.*

*"Being a former industrial use on this site there is no planning objection in principle to a proposed industrial development, subject to detailed layout, landscape and drainage requirements as indicated in consultation comments outlined above and as discussed [at the pre-app meeting]."*

- 4.8 The principal of this development is therefore agreed as sound, subject to satisfaction of the matters outlined above in conjunction with local support. A factor of particular note identified by the Planning Officer at the pre-application stage was the potential flood risk as mentioned previously. This matter has been considered more fully below in this report.



## 5.0 Planning Policy Context

- 5.1 National Planning Policy is contained within Planning Policy Wales (PPW Edition 10 December 2018) and is supplemented by a series of Technical Advice Notes (TANs), discussed below. PPW 10 sets out the underlying basis for delivering sustainable development, with an importance on 'place making.' It promotes the development of productive and enterprising places which generate economic, social, environmental and cultural well-being by providing well-connected employment and economic development in pleasant surroundings.
- 5.2 At the heart of the PPW runs the concept of sustainable development, defined within the PPW as the process of *"improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals."* The PPW goes on to define this as: *"...act(ing) in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs."*
- 5.3 The planning system is central to achieving sustainable development in Wales. Paragraph 1.15 of the PPW states that it *"provides the legislative and policy framework to manage the use and development of land in the public interest so that it contributes positively to the achievement of the well-being goals."*
- 5.4 This is achieved through a 'plan led' approach, which is secured by legislation to provide a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate that social, economic, cultural and environmental issues are balanced and integrated.
- 5.5 This Planning Statement will demonstrate how the proposed development runs concordantly with the Development Framework, the key concepts of sustainable development, and how, where material considerations may have indicated challenges, they can be overcome to provide a development key to the continued prosperity, social and economic well-being of Cwmbran.

## PPW 10

- 5.6 PPW 10 makes reference to a number of policies of specific importance to the proposed development:

### Placemaking in Action

- 5.7 Good design is a key component of PPW 10, with Paragraph 3.3 stating that: *"Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places."*
- 5.8 *"Design is an inclusive process, which can raise public aspirations, reinforce civic pride and create a sense of place and help shape its future."* (ref. Paragraph 3.4)
- 5.9 The proposed design seeks to optimise the site to ensure the best use of space, to provide world-class facilities, to energise colleagues and to remediate a despoiled area of ground to a location and townscape to inspire pride.

### Economic Development

- 5.10 PPW Chapter 5 'Productive and Enterprising Places' recognises the role that new economic development plays in supporting the Welsh economy, advising that: *"For planning purposes, the Welsh Government defines economic development as the development of land and buildings for activities that generate sustainable long term prosperity, jobs and incomes."*
- 5.11 Paragraph 5.4.3 states that: *"Planning Authorities should support the provision of sufficient land to meet the needs of the employment market at both a strategic and local level."* It goes on to say, inter alia, that plans should: *"...provide a framework for the protection of existing employment sites of strategic and local importance."*
- 5.12 Paragraph 4.4.4 states that: *"Wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration. Sites identified for employment use in a development plan should be protected from inappropriate development."*

- 5.13 The proposed development is the very epitome of economic regeneration. The proposed development has proved over the last century its sustainable and economically sound credentials, plus its ability to continue to deliver high quality manufacturing jobs into the future.

### **Previously Developed Land**

- 5.14 PPW places an emphasis on the reuse of previously developed land (PDL) stating that this should, wherever possible, be used in preference to Greenfield sites where it is suitable for development. Planning Authorities should *"work closely with landowners to ensure that suitably located previously developed land sites are brought forward for development and to secure a coherent approach to their development."* (ref. Paragraph 3.52)
- 5.15 Planning Authorities should also take a 'de-risking' approach to unlocking the development potential of sites. This involves taking a positive approach to development of the previously developed land, seeking appropriate mitigation strategies to potential development challenges.
- 5.16 The Local Authority therefore recognises the importance of re-using previously developed land, and accepts that, by its very nature, PDL comes with its own set of development challenges to overcome – for example, contamination, noise, amenity, transport and flooding. Historically however these sites are often best located in terms of serving local populations and providing accessible, sustainable employment. Overcoming challenges associated with these sites in a positive manner is therefore crucial.

### **Technical Advisory Notes**

#### *TAN 23 - Economic Development*

- 5.17 TAN 23 confirms that LPAs should recognise market signals and have regard to the need to guide economic development to the most appropriate locations, rather than to prevent or discourage development. TAN 23 also confirms that when identifying land for economic uses in Development Plans, or when determining applications, LPAs should apply a sequential approach to site selection in accordance with PPW. TAN 23 recognises that development proposals for employment sites should be steered to the most efficient and sustainable locations.



- 5.18 In balancing economic, social and environmental considerations, TAN 23 also identifies that LPAs should apply three tests when allocating sites or assessing planning applications:
- Alternatives: whether the demand can be met on alternative sites which cause less harm
  - Jobs accommodated: direct and indirect job creation; and
  - Special merit: whether the development will make any special contribution to policy objectives, for example, help to fight social exclusion or improve deprived communities.
- 5.19 In this case the proposed development is located on an accessible site which will cause no harm. The proposal will both secure 170 existing jobs and safeguard local supply jobs and will provide new facilities which will be of community benefit well into the future. Of additional and crucial importance is that this site is located adjacent to the company's existing premises – meaning that there will be zero interruption to the lives and economic well-being of its existing staff. There will be no cause for job-loss or additional economic pressures through for example greater commuting distance as a result of the proposed move of the company's premises.

*TAN 12 – Design*

- 5.20 Development proposals are required to demonstrate how sustainable design principles have been taken into account.
- 5.21 Consideration and implementation of a design scheme which takes into account access for all, character and a suitable response to the local townscape and existing infrastructure, community safety, environmental sustainability, and movement are crucial to sustainable design.
- 5.22 As a New Town, Cwmbran is known for its pioneering post-war approach to modernist architecture not far from The Tower. The proposed development reflects these modernist principles. The site is well located in terms of local infrastructure – with excellent access on foot to both the town itself and to public transport services. Cwmbran railway station is a minute walk away.

*TAN 15 – Flood Risk*

- 5.23 TAN 15 advises caution in respect of new development in areas at high risk of flooding by setting out a precautionary framework to guide planning decisions. The overarching aim of the precautionary framework is, in order of preference, to: *"Direct new development away from those areas which are at high risk of flooding."* Or, *"Where development has to be considered in high risk areas (zone C) only those developments which can be justified on the basis of the tests outlined in section 6 and section 7 are located within such areas."*
- 5.24 Elements of the site are located within Flood Zones B and C2. The implications of the site's location, as outlined above in 'Constraints/Opportunities' and Figure 12 have been assessed separately with their conclusions discussed below in this report as well as how the proposed development meets the relevant tests outlined in TAN15. Supporting documentation has been submitted separately in support of this application.
- 5.25 It is understood that a replacement version of TAN15 is due for publication, however this has yet to be published.

**Local Development Plan (to 2021)**

- 5.26 Section 70 of the Town and Country Planning Act 1990 states that in dealing with an application for planning permission the local planning authority shall have regard to the provisions of the Development Plan. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that the determination must be made in accordance with the plan unless material considerations indicate otherwise.
- 5.27 In this instance the Development Plan relevant to the application site is the adopted Torfaen Local Development Plan (LDP), adopted 3<sup>rd</sup> December 2013. The LDP presents a spatial vision for the future of the County and a framework for the distribution and delivery of growth and development between 2006 and 2021. It sets out the land use planning policies and proposals for Torfaen which are used in the determination of planning applications. These policies and proposals include land use allocations for different types of development, including retail and employment development, as well as criteria for assessing individual proposals up to 2021.
- 5.28 The following policies, proposals and constraints are considered to be of relevance to the application site and proposed development.

### *Land Use Designations*

- 5.29 The LDP is supplemented by a Proposals Map and a Constraints Map which spatially illustrate the Council's planning objectives, land use designations and environmental constraints. This is attached above at Figures 11 and 12.
- 5.30 There are no land use designations or planning / environmental constraints covering the application site, however page 51 of the Local Plan makes direct reference to the site (known as *Eastern Strip South – land owned by Alfa Laval and Carillion Richardson on Grange Road, Cwmbran*).
- 5.31 The Council commented that:
- "In terms of the parcel of land known as Eastern Strip South, The Council's vision for the area is for the comprehensive redevelopment of the site, to create a quality and distinctive location that integrates well to the Town Centre. Any proposals for this site should take full account of the need to integrate fully within the Eastern Strip Central SAA, the Town Centre and the wider proposals."*
- 5.32 However, the Council noted that this site, together with a number of other sites requiring remedial works were not included on the proposals map through insufficient evidence to support their allocation. The council noted that it was *"aware that the sites are subject to a number of constraints most notably contamination and flood risk."* These two factors have been addressed below in this report and in the supporting documents.
- 5.33 In terms of planning policy land use designations close to the site, the eastern boundary abuts a designated 'Walking and Cycling Route Safeguarding' and the site is located within close proximity to areas of 'Important Urban Open Space' to the east, south and west. The site is also located just south (approximately 250m) of Strategic Action Area (SAA) 1 – 'Eastern Strip Central'.
- 5.34 The SAA1 designation lies just to the north of the application site but is separated from it by the applicant's existing site. The LDP proposal envisaged the partial redevelopment/ refurbishment of the Meritor plant and site as a whole. Planning permission was granted in 2011 and major elements have already been undertaken. This has included the construction of a Morrison's superstore, petrol filling station and several unit shops at the northern end of the site, together with the construction of a new footbridge link into the town centre.



### *LDP Objectives*

- 5.35 Key to the development proposal is LDP Objective 1 which seeks *"To ensure the provision of an appropriate quantity and range of employment sites and retail opportunities to support high and stable levels of employment in Torfaen and to deliver a competitive, modern and sustainable economy and thriving town centres."*
- 5.36 Given that the application site is previously developed land, a further LDP Objective to consider is Objective 13 which seeks *"To protect Greenfield land by enabling and promoting the most efficient use of appropriate brownfield sites for redevelopment across Torfaen."*

### *Strategic Policies*

- 5.37 LDP Policy S1 defines urban boundaries and seeks to promote the full and effective use of urban land and to allow for development to contribute to the creation of sustainable communities and define the urban area within which there is a presumption in favour of development. The proposed development is located wholly within the urban boundary.
- 5.38 LDP Policy S2 pertains to sustainable development, stating that proposals will need to take account of a number of key principles, most particularly that they contribute to regeneration of existing communities, are sustainable in terms of access and transport, conserve the natural and built environment, promote an efficient use of land, maximise the efficient use of community infrastructure, utilised sustainable construction techniques, promote sustainable economic growth, and are located within the urban boundary.
- 5.39 The proposed development satisfies all the tenets of sustainable growth.
- 5.40 Strategic Policy S6 'Employment and Economy' states that:

*"The employment and economic development needs of Torfaen will be met by the identification of 40.3ha of land for employment and business purposes (use classes B1, B2 and B8) and 35ha for strategic regional employment opportunities during the Plan Period 2006-2021. The employment role of important industrial and business areas will be enhanced and protected. A range and choice of accessible employment sites will be delivered throughout Torfaen to enable opportunities for business and local employment needs to be met. This will include provision to enhance town centre based employment and economic uses and to increase the tourism, leisure and retail offer in Torfaen."*

- 5.41 Paragraph 4.2.10 notes that Cwmbran is served by a north-south spine of employment/industrial areas located adjacent to the railway line with other major employment areas at Springvale and more recently Llantarnam. The LDP stresses that development sites for new employment opportunities are needed to ensure that the employment sector can expand, adapt and diversify to the changing economic environment and challenges.

- 5.42 Paragraph 4.2.10 continues:

*"...In addition particularly in Cwmbran existing valued employment sites need to be protected from pressure from other higher value land uses, which can deplete employment sites and lead to potential conflicting uses. Specifically, housing, retail and leisure proposals on employment areas need to be fully justified."*

- 5.43 Whilst the policy seeks to allocate new employment land, paragraph 5.6.4 also identifies a focus on the regeneration of existing employment sites in order to improve, intensify and diversify them and in doing so, strengthen the County Borough's economy.

#### *Employment, Economy and Tourism*

- 5.44 Policy EET5 seeks to protect existing industrial land (B1, B2 and B8 uses) stating that *"maintaining and supporting existing industrial businesses helps to ensure employment opportunities remain locally accessible."*
- 5.45 The policy goes on to say at Paragraph 8.16.4 that redevelopment proposals should ensure they are both in keeping with the character of the area, are easily and safely accessible for their intended use and area in accordance with the other policies and employment strategy of the LDP.

## Site Specific Issues

### *Ecology*

- 5.46 A Preliminary Ecological Appraisal was undertaken in April 2020 which has been submitted separately in support of this application.
- 5.47 The PEA reported that there were no ecological receptors on site and that the habitats on site were of negligible nature conservation value. The site was described as 'ecologically isolated.' It was recommended that vegetation clearance should be undertaken outside of nesting bird season or failing that under ecological supervision.
- 5.48 No protected species were identified. Notwithstanding this, suitable mitigation measures were recommended.

### *Contamination*

- 5.49 As explained previously, the site's previous buildings were demolished in 2004 with the remaining hardstanding broken up in 2014. It is understood that asbestos containing floor tiles and a stockpile containing asbestos paper backing was removed from the south east corner of the site at this time. Paragraph 3.51 of the PPW seeks to remediate previously developed land through remediation to reduce risk to human health.
- 5.50 An Asbestos Contaminated Land Survey has been submitted separately in support of the proposed development.
- 5.51 The survey revealed the presence of asbestos-containing materials and distributed asbestos fibres in soils, perimeter bund and stockpile of crushed brick and concrete.
- 5.52 Although widespread, the amount of asbestos contamination was reported to be very low, with the report referring at paragraph 7.10 that "*negligible amounts of Asbestos were identified*". Potential risks to future users were identified particularly in areas of soft landscaping, and to construction workers during construction of the proposed development, though it was acknowledged that adherence to appropriate health and safety policies in the construction phase would not present in acute risk to human health.

5.53 Notwithstanding this, the mitigation strategy recommends that once larger items have been removed, any remaining material could safely be incorporated into the proposed development without any further special measures. Areas of soft landscaping were advised to have 300mm cap of clean material.

5.54 The contamination investigations and mitigation strategy concludes that the site's contamination is not extensive and that its redevelopment is wholly safe and deliverable when allied to achievable mitigation measures.

*Flood Risk and Drainage*

5.55 At present, TAN15 is still current, though it is understood that this will be replaced in the near future.

5.56 As outlined above, TAN15 provides a precautionary framework to guide development in areas which may have the potential to be affected by flooding. This framework seeks firstly to steer development away from areas at **high** risk of flooding. Where developed can be considered in areas of potential risk, tests outlined in sections 6 & 7 of TAN15 should be satisfied:

5.57 The tests in Section 6 are as follows:

- Its location in Zone C is necessary to assist, or be part of, a local authority regeneration initiative or a local authority strategy required to sustain an existing settlement;

**Or,**

- Its location in Zone C is necessary to contribute to key employment objectives supported by the Local Authority, and other key partners, to sustain an existing settlement or region.

**And,**

- It concurs with the aims of PPW and meets the definition of Previously Developed Land; and
- The potential consequences of a flooding event for the particular type of development have been considered, and in terms of the criteria contained in sections 5 and 7 appendix 1 found to be acceptable.



5.58 Section 7 goes further and seeks to ensure that all development is as safe as possible and that there is

- Minimal risk to life
- Minimal disruption to people living and working in an area
- Minimum potential damage to property
- Minimal impact of the proposed development on flood risk generally; and
- Minimal disruption to natural heritage.

5.59 Figure 2 to Section 5 of TAN15 identifies the proposed development in this location as 'Less Vulnerable Development.' Figure 1 to Section 4 identifies Less Vulnerable Development to be acceptable in C2 areas, subject to the above tests.

5.60 Looking at the tests, it is acknowledged that the site is not specifically allocated for development at present, however, as mentioned above, the site is specifically mentioned on page 51 of the Local Plan, though not included as a proposal owing to uncertainty regarding, inter alia, flooding. It is therefore the case that this site is *de-facto* an allocated site subject to satisfaction of flood risk. In addition, by rights the site should be considered by the Local Authority as necessary to contribute to key employment objectives, and therefore a positive approach to de-risk the site in support of development should be taken. The site conforms to the definition of Previously Developed Land.

5.61 The applicants have considered the concept of moving to an alternative site, however this was not deemed appropriate for the company, for two very important reasons;

- Firstly, the proposed site is situated adjacent to the existing company premises – where the firm have been located in Cwmbran for nearly a century. It is accessible without having to transit through the town, is well known and retention of the location will aid in ensuring that there is no interruption in trade through the transitional process to the new site; to customers it will be 'business as usual.'
- Of perhaps greater importance though is that the company have a highly trained local workforce whose lives and livelihoods depend in large part upon the firm's location. Locating the new premises adjacent to the old will result in their being no interruption to staff; there will be no increase to staff commuting costs, no need to relocate staff and no interruption to family life of family finances.

5.62 In terms of satisfying the tests in Section 7 as outlined above, a Flood Consequence Assessment together with Sustainable Drainage Strategy has been undertaken and

submitted in support of this application. The FCA unequivocally supports the proposed development.

5.63 Hydraulic modelling has been undertaken for the post-development scenario, with the results demonstrating that the building would be flood-free in the 1 in 1000 year event. Furthermore, car park depth would be a maximum of 420mm – significantly less than the allowable flood depth of 1m in a 1 in 1000 year event. A flood evacuation plan has also been submitted.

5.64 On the basis that the proposed development is constructed in accordance with the FCA, the report concluded that the building is:

- Suitable in the location proposed
- Will be adequately flood resistant and resilient
- Will not place persons at risk and will offer safe access and egress
- Will not increase flood risk elsewhere a result of the proposed development through the loss of floodplain storage or impedance of flood flows.

5.65 The proposed development will therefore satisfy TAN15.

## 6.0 Conclusion

- 6.1 The proposed development will secure the future of a well-established business which now urgently requires alternative premises upon which to build a new world-class manufacturing facility. This business employs 170 people at present in high quality positions. The new facility will safeguard these jobs for Cwmbran long into the future as well as providing an opportunity for greater expansion and the provision of future jobs.
- 6.2 In achieving the above, the proposed development will remediate a despoiled site which has lain vacant since 2004 and which presents an unwelcoming and unattractive aspect to Cwmbran, despite previous attempts at its remediation. By contrast, the proposed development's modern approach will complement the fundamental ethos of Cwmbran as a New Town, building upon its original design concept for the 21<sup>st</sup> Century.
- 6.3 Notwithstanding the obvious support provided by the Welsh Government and the Local Authority, together with the hoped for support of the local community, as well as myriad local and national policies which seek to stimulate growth, generate high quality jobs, remediate despoiled parts of our towns and cities and establish a sustainable, liveable economy well into the future, the proposed development represents a massive investment and a very positive future for the town. The pre-application discussions with the Local Authority generated support and there is no doubt that this proposal is overwhelmingly acceptable in principle.
- 6.4 As part of the determination process, the Local Authority's remit is to identify constraints to ensure that all development is undertaken in the public interest, and in this instance they have identified two principal challenges, being contamination and flood risk. Submitted in support of this application are investigative reports, which have been summarised above and which both, again unequivocally, determine this application as safe and deliverable.
- 6.5 Elsewhere, other constraints can be mitigated against.
- 6.6 It is therefore conclusive that this proposed development satisfies all policy requirements, and, being so urgently required, should be determined positively without delay.



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