

Planning Department
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
DA12

Date: 2nd December 2021

Dear Sir / Madam

Metropolitan Police Service Specialist Training Centre, Mark Lane, Gravesend, DA12 2HN

On behalf of our client, The Mayor's Office for Policing and Crime (MOPAC), please find enclosed an application seeking planning permission for the construction of a new concrete live fire skills house training building (plus abseil frame) with new ancillary support building, at the Metropolitan Police Service Specialist Training Centre, Mark Lane, Gravesend, DA12 2HN. The application has been submitted online via the Planning Portal (PP-10411021) and consists of the following documents:

- Application form
- This Cover Letter
- Statutory Planning Application Fee of £7,392.00 (paid by BACS)
- Design and Access Statement, prepared by Clifford Tee and Gale Architects and Surveyors
- Flood Risk Assessment, prepared by Atkins
- Drawings as follows:

Drawing No.	Drawing Title	Scale & Size
P18046-CTG-SP-0000 Rev. P3	Site Location Plan	1:1250 @ A3
P18046-CTG-SP-0001 Rev. P2	Existing Site Plan	1:100 @ A1
P18046-CTG-SP-0002 Rev. P3	Proposed Site Plan	1:100 @ A1
P18046-CTG-PL-0003 Rev. P3	Proposed Ground Floor Plan	1:50 @ A1
P18046-CTG-PL-0004 Rev. P3	Proposed Level 1 Floor Plan	1:50 @ A1
P18046-CTG-PL-0005 Rev. P3	Proposed Level 2 Floor Plan	1:50 @ A1
P18046-CTG-PL-0006 Rev. P3	Proposed Level 3 Floor Plan	1:50 @ A1
P18046-CTG-EL-0009 Rev. P1	Existing Elevations	1:100 @ A1
P18046-CTG-EL-0010 Rev. P3	Proposed Elevations	1:100 @ A1
P18046-CTG-SE-0038 Rev. P3	Proposed Sections A-A & B-B	1:50 @ A1
P18046-CTG-SE-0039 Rev. P2	Proposed Sections C-C & D-D	1:50 @ A1
P18046-CTG-SE-0040 Rev. P2	Proposed Section E-E	1:50 @ A1
P18046-CTG-PL-008 Rev. P2	Proposed Support Building Plans	1:50 @ A1
P18046-CTG-EL-011 Rev. P2	Proposed Support Building Elevations	1:50 @ A1

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Site Context

The Metropolitan Police Specialist Training Centre (MPSTC) is located on the southern side of the River Thames in an industrial area approximately 2.5 kilometres from the centre of Gravesend.

The application site comprises of a fenced area of hardstanding situated on the north eastern corner of the MPSTC. The site extends to approximately 1,506 sqm in size (red line area) and is currently used for police training purposes.

The application site is located within a Flood Zone 3 that benefits from flood defences as indicated on the Environment Agency's flood map.

A more detailed summary of the context and functions of the MPSTC is enclosed at Appendix 1.

Application Proposal

Planning permission is sought from Gravesham Borough Council for the:

“Construction of a new concrete live fire skills house training building (plus abseil frame) with new ancillary support building, and associated works”

The proposals will comprise of two new buildings on the site. This includes:

- A new two-storey fair faced concrete Live Fire Skills House (including an abseil frame) with a floor space of 1,046m² over ground floor and level 1). The roof area provides enclosures for plant and storage at level 2 and fixing points for abseil training and helicopter simulator at level 3.
- An ancillary support single storey building with a floor space of 134m², to provide new toilet facilities, kitchenette, instructors' office and operations room. This support building will comprise of fair faced blockwork with a metal roof to match other buildings on the site.

With regards to height, the proposed Skills House will have a building height of 11m (13.6m with abseil frame) which is taller than the adjacent warehouse building immediately south of the site which is approximately 10.3m in height. We have been advised by the MPS that the building needs to be this height and in this position in order to support the abseil frame on the proposed building.

Please refer to the enclosed plans and Design and Access Statement for further information on the proposals.

Rationale for New Building

The planning request to create a new structure at the MPSTC site is for the following armed policing rationales:

- As the existing live fire skills house does not form all of the functions needed in order to train firearm officers, a new live fire skills house is required. Firearms training is of critical importance for the MPS. The Government has recently announced its plans to recruit 20,000 new police officers over the next three years of which 6,000 has been allocated to London. In response to the growing number of officers and the increase in gun crime in London, the training of new police officers is critical for the purposes of national security, national defence and functioning of the state. With the significant boost in police numbers and an increasing need for firearms response, the building of this new live fire skills house training facility is considered fundamental for the MPS to ensure its ability to maintain an effective counter terrorism capability, which is critical to the security of London and beyond
- The new structure will be larger than the existing one which will allow a greater variety of training.
- It will be designed and built to current and foreseeable standards of safety and longevity.
- It will move to a stand-alone location on the estate that will have less impact on the other activities currently disrupted when the facility is employed (the current facility is choked for access and in effect restricts concurrent activities when in use, overall impacting on the quantity of training that can be delivered on the site. There is no scope to extend or improve the current location due to its primary location).

- It will be designed to allow a greater training benefit by the enhanced ability to blend the various tactics and equipment used.
- It will contribute to the National Armed Capability of the MPS to combat terrorism.
- Other options to build elsewhere than MPSTC have been the subject of a lengthy investigation. The result is that it is the best option to invest in the existing center that provides for all of the necessary support and infrastructure.

In summary, the MPS have a mandate by the training curriculum to conduct live fire training. The existing facility is no longer fit for purpose due to licensing issues regarding its build and performance. It will however, still be kept for some training. The site of the existing facility does not lend itself to redevelopment due to physical location and size restriction. Therefore, the building of this additional training facility at MPSTC Gravesend is considered a critical requirement for the MPS and its ability to maintain an effective counter terrorism capability.

By new development on the site, within the terms of use and original boundary, the creation of this facility will see the highest level of training, the safest practices and the most realistic outcomes to train and prepare officers for what they may have to face in the line of duty.

Planning Policy Context

For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Gravesham Local Plan Core Strategy (September 2014), Saved Policies of the Gravesham Local Plan First Review (adopted November 1994 and some policies saved in 2007) and the Kent Minerals and Waste Local Plan 2013 -30 (July 2016). Other material considerations include the National Planning Policy Framework (2019), National Planning Practice Guidance and relevant supplementary planning documents.

Further, the Council are currently preparing the Site Allocations and Development Management Policies Document which, once adopted, will form part of the Development Plan and replace the remaining saved policies in the Gravesham Local Plan First Review. The first stage of consultation on the Site Allocations and Development Management Policies Document (Regulation 18) ran to 11 July 2018. The emerging Site Allocations and Development Management Policies Document is therefore at quite an early stage and as such, has not been considered as part of this application.

The application site is designated within the urban area boundary of Gravesend, the Gravesend Riverside East and North East Gravesend Opportunity Area, the lower Thames Crossing buffer Zone and Kent County Council Mineral Safeguarding Area. The site is also located within Flood Zone 3.

The site lies within close proximity to the Thames Estuary and Marshes Special Protection Area (SPA) and Ramsar Site and the South Thames Estuary Site of Special Scientific Interest (SSSI) (to the South), to the east lies the Green Belt, and to the north and east of the site lies a local wildlife site. The site is not however, located within these designations.

Planning Assessment

Principle of development

This application seeks consent for the construction of a new live fire skills house training building (plus abseil frame) and new ancillary support building. The building of this additional training facility at MPSTC Gravesend is considered fundamental for the MPS to ensure its ability to maintain an effective counter terrorism capability, which is critical to the security of London and beyond.

The site is located within the urban boundary of Gravesend which is covered by Policy CS02 of Gravesham Core Strategy (LPCS), which supports the principle of development within the urban area of Gravesend and rural settlements inset from the Green Belt.

Gravesham Local Plan Core Strategy Policy CS04 (Gravesend Riverside East and North East Gravesend Opportunity Area) states that, "The Canal Road Industrial Site, Canal Road Gasholders, Riverside Industrial Area East of Canal Basin, Metropolitan Police Site and Norfolk Road Industrial Area will be retained in employment use. The Council will support proposals which improve their operation and the quality of their environment."

The proposals would not see the employment of any new activity not already conducted on the estate at various locations. The existing blend of skills will remain the same - but in safer and better designed facilities. Further, the proposals will provide a Skills House that has better ventilation, better security and by physical situation, a safer overall environment for concurrent training activities, and will in turn improve the operation of the Metropolitan Police Site.

Overall, the proposals have regard to the three pillars of sustainability and are therefore in accordance with the NPPF, which highlights that the purpose of the planning system is to contribute to the achievement of sustainable development. Moreover, the proposals are in accordance with the policies of the Local Plan Core Strategy. It is therefore considered that the principle of development is supported by planning policy in this location

Layout / Design

The design of the scheme is discussed within the accompanying Design and Access Statement, however, the main considerations are outlined and addressed below.

Although the proposals will result in a spread of built form on the site, given the siting of the proposed development within the north east corner of the wider Metropolitan Police Specialist Training Centre site, as the site is not within the Green Belt this spread of development would not result in overdevelopment of the wider site.

Policy CS19 (Development and Design Principles) of the Gravesham Local Plan Core Strategy (LPCS) sets out that the design, layout and form of new development will be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and the character of the area.

The design of the scheme has evolved following a detailed assessment of the site and its immediate surroundings and through pre-application undertaken with Gravesham Borough Council. Great care has been made in order to incorporate the comments from the pre-application consultation in to the final proposals for the site, which this application now proposes.

The proposals have been sympathetically designed, having regard to the users as well as the appearance of the skills house and ancillary building when viewed from the immediate surrounding area. The proposals are therefore of a suitable scale, massing and height to the setting of the site, the buildings will integrate well with the immediate surrounding area, and respect the local context as far as possible. The proposal would have no undue impact on the privacy and visual amenity of occupiers within the area, given the siting of the buildings which are located far away from any residential / other occupiers, in line with LPCS Policy CS19.

The external facing materials for the new skills house is proposed to be fair faced concrete with stair and balcony configurations to represent the differing building styles for training. The new walls of the ancillary building are proposed to be fair faced blockwork with a metal roof to match other buildings on the site. The proposed buildings have been designed using materials which are in keeping with the existing form of the buildings on site as far as possible, and will not therefore impact on the character and appearance of the surrounding area.

The proposed external lighting on site has been carefully considered to ensure that there will be no impact on the wider landscape. The lighting is appropriate for the intended use, and will provide the minimum amount of light necessary to achieve its purpose.

The proposed development is of high quality design and responds positively to the surrounding context of the area as far as possible.

Highways impact

There will be no additional trips to the site as a result of the proposed development and sufficient on-site parking is available on the wider site, and so the proposed skills house and ancillary support building will not therefore, have an impact on parking, nor will it have any impact on the wider highway network, in accordance with LPCS Policy CS11 (Transport) and Saved Policy T1 of the Gravesham Local Plan First Review.

Flood Risk

A Flood Risk Assessment has been prepared by Atkins to support the planning application, and a pre-application has been undertaken with the Environment Agency and the recommendations of this have been considered as part of the application submission, in accordance with LPCS Policy CS18. The Flood Risk Assessment provides the following conclusions:

In terms of Tidal Flooding, the site “is protected from direct tidal flooding by the presence of earth embankments which make up part of the River Thames tidal defences. These defence protect the site from tidal flooding during events with an 0.1% AP for the lifetime of the development (50 years) and up to 2090.”

The live fire skills house will be built at ground level and is deemed to be sacrificial, however the ancillary support building will be raised by 1.2m above ground level. Flood depths within the ancillary building are estimated to be 0.6m during a 0.5% AP event.

The MPS have a Flood Warning and Evacuation Procedure that triggers a site evacuation upon receipt of a flood warning, and this will ensure that no staff and trainees are on site when the risk of breach is at its highest.

In terms of Surface water flooding, the “site is surrounded by a number of drainage ditches, some of which are classified as main rivers. The outfall of these ditches to the River Thames is flapped and maintained by the EA. In the event of high rainfall coinciding with a high tide, localised surface water flooding could occur across the site, if the capacity of the ditches is exceeded. The Environment Agency’s RoFSW classifies the site as having a low risk of surface water flooding between a 1% and 0.1% AP. Flood depths on the site during these events are estimated to be between 300-900mm. The support building is 1.2m higher than ground level, and therefore will be protected from surface water flooding.

The proposed development will not increase the existing risk of surface water flooding, because the works are taking place on an existing hardstanding site, so there will be no change in impermeable areas contributing to increased runoff rates and volumes.”

In terms of planning policy, the “proposed development is an extension to an existing training facility and by its nature must be located on the same site. The most significant risk of flooding on the site would occur as a result of a breach in the tidal defences. During this scenario the risk and depth of flooding would be consistent across the site and so sequentially, the proposed location of the training facility cannot be located in an area of the site with a lower risk of flooding. The proposed development is therefore considered to pass the Sequential Test.

Less vulnerable development is appropriate within Flood Zone 3a and there is no further requirement to apply the Exception Test. The proposed development including the mitigation of raising the support building and provision of a flood evacuation plan, is therefore considered appropriate for the level of risk on the site and in line with NPPF.”

Noise Impact

There is already a condition in place on the overall site in respect of noise. As such, a Noise Assessment is not considered necessary as the proposal is in accordance with the condition wording, which we provide details of below:

In terms of the main site, condition 17 of the 21 July 2000 consent (application ref: GR/19990881) states that “No public order training or firearms training within external areas which is audible at the nearest noise sensitive

premises shall take place on the site before 07:30 hrs or after 21:30 hrs weekdays nor at any time on Saturdays, Sundays, Bank or public holidays, unless otherwise agreed to in writing by the District Planning Authority."

An application to vary the noise limit conditions (14, 15, 16 and 17) of permission GR/19990881 was then approved on 25 April 2001. This removed the reference to 'nearest noise sensitive premises' contained in those conditions and substitute noise contour diagrams as a means of assessment (please see the noise contour diagram relating to condition 17 at **Figure 1** below). Condition 17 was therefore amended to read as follows, "No public order training or firearms training within external areas which is audible at any noise sensitive premises at or beyond the contour shown on the attached plan (reference: SRP 992514/S/SK17) shall take place on the site before 07:30 hrs or after 21:30 hrs weekdays nor at any time on Saturdays, Sundays, Bank or public holidays, unless otherwise agreed to in writing by the District Planning Authority."

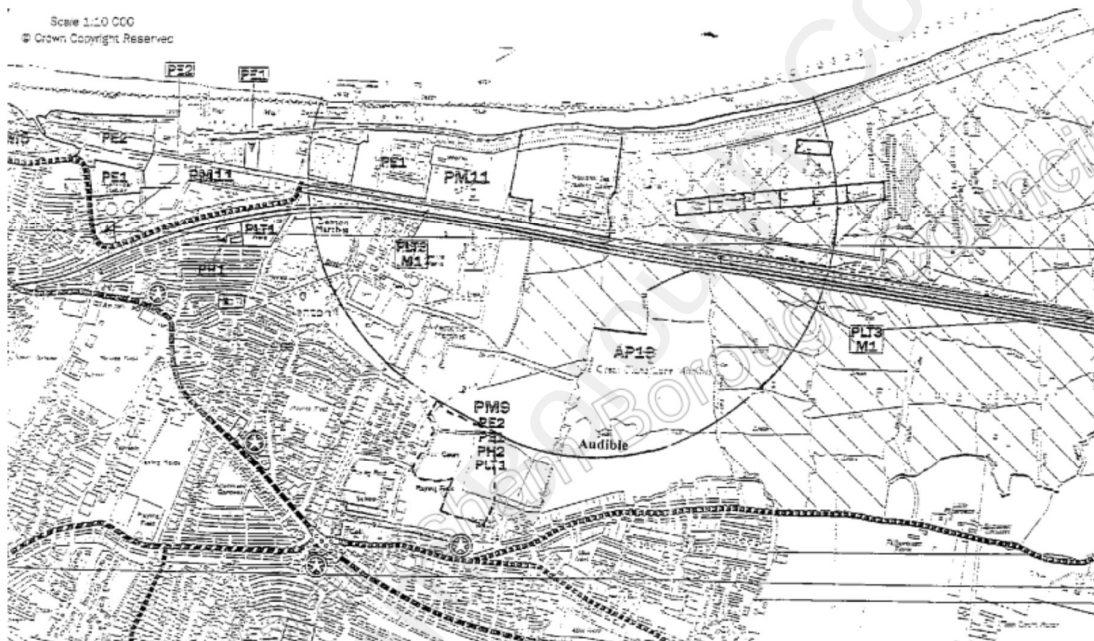


Figure 1: Noise Contour Diagram

This indicates that anything inside the contour is not affected. If firing is however audible at any noise sensitive premises at or beyond the contour then weekend firing (along with all the other restricted days / times put forward in condition 17) would be restricted.

Summary

In summary, as the existing live fire skills house does not form all of the functions needed in order to train firearm officers, a new live fire skills house is required. Firearms training is of critical importance for the MPS.

With the significant boost in police numbers and an increasing need for firearms response, the training of new police officers is critical for the purposes of national security, national defence and functioning of the state. The building of this new live fire skills house training facility is therefore, considered fundamental for the MPS to ensure its ability to maintain an effective counter terrorism capability, which is critical to the security of London and beyond.

The proposed development has been subject to an extensive pre-application exercise and all issues have been addressed as part of the application submission and so it is pressing to obtain the decision at the earliest opportunity for this important training facility.

Overall, the proposals are considered to be consistent with national and local policy.

We trust that the enclosed is sufficient to enable the registration and consideration of this application.

Yours sincerely



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Encl.