

Abergavenny

NP7 5AA

ABERGAVENNY VELO PARK PLANNING STATEMENT

1.Introduction

This Planning Statement has been prepared by Owen Davies Consulting on behalf of Monmouthshire County Council in support of a planning application made to Monmouthshire County Council ('the Council') as Local Planning Authority (LPA) for the approval of an application for a 'velo park' ('the Proposed Development') on land adjacent to Llanfoist Household Waste and Recycling Centre/Racecourse Farm, Abergavenny, Monmouthshire.

The full description of development for the Proposed Development as set out in the application form is as follows:

'Planning permission is sought for the development of the site for a 'Velo Park' comprising a closed road circuit with ancillary bicycle storage units (three cargo containers), car parking and street lighting.'

This application is being put forward by Monmouthshire County Borough Council which is the landowner of the application site. The main purpose of this Planning Statement is to test the compliance of the Proposed Development against prevailing national and local planning policy guidance.

Structure of the Planning Statement

The sections of this Planning Statement are structured as follows:

- Section 2 The Need for a Closed Road Circuit (CRC) in the Abergavenny area
- Section 3 The Site and the Surrounding Area
- **Section 4** Planning History
- **Section 5** Planning Policy
- Section 6 Pre-application and Community Engagement
- Section 7 The Proposals
- **Section 8** Assessment of the Proposals
- Section 9 Conclusions

2. The Need for a Closed Road Circuit (CRC) in the Abergavenny area

There is a demonstrable need for investment in a new cycling facility located in the Abergavenny area. Welsh Cycling's Strategy has identified Monmouthshire as an underserved area, and Abergavenny as the preferred location. The need/demand analysis has shown that there is an absence of suitable facilities within the local catchment area, as well as high levels of cycling club membership within easy reach of Abergavenny. An active

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network of cycling clubs and Go-Ride clubs also provides two essential ingredients for sustaining a CRC facility in the Abergavenny area.

The aim of Welsh Cycling is to develop a regional standard facility that serves at least a one-hour travel-time catchment area. Ideally, this should take the form of a hub, or 'velopark' with a mix of different cycling facilities built around a core CRC. The opportunity for linking together with other leisure and education facilities should be taken if feasible, as well as supporting other community facilities and events strategies wherever possible.

The evidence from the gap analysis and assessment of need and demand indicates:

- A strategic need for a Closed Road Circuit (CRC)
- A need for a dedicated coaching facility for Go-Ride programmes and clubs
- Opportunity to provide complementary facilities alongside a CRC such as meeting the demand for cyclo-cross and children level MTB
- A strong core of cycling clubs local to Abergavenny, including Go Ride, to sustain interest and use in a new facility
- A facility serving the requirements of over 30 cycling clubs and 1,200 British Cycling plus additional club members.
- Opportunities to support a variety of wheeled sports, education and community use.

The study points toward a CRC as the most versatile way of meeting the needs of the south east area of Wales for training, coaching and competition.

Flexibility within the design and use of the facility is critically important as there will be a wide range of potential user groups and participants that need to be accommodated at different times and for a different activity. The facility will need to consider in its design:

- Facilities that allow training and coaching of different age groups and abilities potentially at the same time Go Ride, inter/intra school, coaching, bike handling /women's/disability/para coaching & training
- Talent and performance programme development
- Areas suitable for Bikeability training with simulated road environments
- A circuit that meets the need and level of challenge required for competition level cycling at a national or club level
- Community use that is non-competitive, entry route to cycling
- Organized small group cycling activities, primary school ages and below.
- Bike hire for schools and adapted bike for disabled or para-cycling
- Other sports such as Triathlon, athletics and roller ski.
- Street lighting to maximising evening and winter use
- Access to ancillary facilities including adequate car parking, changing facilities, toilets, storage

Site description and context

The application site is Council owned land at Racecourse Farm 1.5 miles south of Abergavenny Town Centre. It is positioned in a mixed-use area adjacent to a junction of the A465 Heads of the Valleys Road. The area around the road junction has been developed in recent years to accommodate new housing, residential care home, roadside leisure/retail operators including a hotel, restaurant, and drive-through restaurants.

The whole site is 6.4 ha in size and is currently used for pasture for the grazing of horses. Temporary uses of the land in recent years has included overspill events and camping for the National Eisteddfod.

The current access to the land is adjacent to Llanfoist Household Waste Recycling Centre and the One Planet Education Centre. Llanfoist Primary School is positioned at the western boundary of the Racecourse farm site. Other important features include the River Usk to the east and Monmouthshire Golf Course to the south.

The area is clearly one of growth and development, and already includes a mix of land uses including education, waste management and commercial leisure uses.

The floodplain of the River Usk covers the low-lying areas to the east of the site and is categorised as Zone C2, an area of floodplain without significant flood defence infrastructure where only less vulnerable development should be considered. The site is however at a higher level and almost entirely outside of Zone C2, including an area of the former household waste landfill. This area is undulating with some steeply sloping banks.

As well as the unusual topography, there are utility features including the footings and towers for the overhead power lines, underground high-pressure gas main and a gravity sewer pipe, both of these present physical constraints.

The current access is an entrance for agricultural vehicles and service vehicles for the overhead power line formed in the opening between McDonald's and the One Planet Centre.

In terms of the environmental qualities of the site, there is no national or local environmental designation, although the area exhibits a range of natural habitats including ponds and wetland areas. Ecological considerations are important to the site's development.

4. Planning history

There is no planning history relevant to the application site. The area of the existing Waste Recycling Centre and the land located between McDonald's and the One Planet Centre are protected as a Waste Site. Planning permission has also granted in 2018 for 120 residential dwellings and open space to the south of the application site on land at Grove Farm.

5. Planning Policy

In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise.

The Development Plan in this case comprises the following:

 Monmouthshire County Borough Council Local Development Plan (2011-2021) adopted on 27 February 2014.

Planning Policy Wales (PPW) (Edition 10), December 2018 and Technical Advice Note (TAN) 16 - Sport, Recreation and Open Space Technical Advice Note (TAN) 16 - Sport, Recreation and Open Space are material considerations and have been taken into account in the Proposed Development.

Other material considerations that are relevant and have been considered in the Proposed Development include:

• Green Infrastructure SPG (April 2015)

National Planning Policy

Planning Policy Wales (PPW) (Edition 10), December 2018

Planning Policy Wales (PPW) provides the following national planning guidance and the following is particularly relevant to this proposal:

In paragraph. 3.22 PPW seeks to promote healthier places and states that 'Planning authorities should develop and maintain places that support healthy, active lifestyles across all age and socio economic groups, recognising that investment in walking and cycling infrastructure can be an effective preventative measure which reduces financial pressures on public services in the longer term.'

In paragraph 3.56 PPW states that 'Development in the countryside should be located within and adjoining those settlements where it can be best accommodated in terms of infrastructure, access, habitat and landscape conservation.' However, new building in the open countryside away from existing settlement or areas allocated for development plans must be strictly controlled'

Paragraph 4.5.2 advises '.... planning authorities to provide a framework for well located, good quality sport, recreational and leisure facilities and develop clear policies for the provision, protection and enhancement of sport, recreation and leisure facilities.

Paragraph 4.5.5 advises planning authorities '....to indicate the ways in which previously developed or disused land and water bodies can be used for sport and recreation uses....'

Paragraph 6.2 of PPW encourages the integration of Green Infrastructure and new development through careful design and the submission by developers of Green Infrastructure Assessments.

In relation to lighting paragraph 6.8.1 states:

'There is a need to balance the provision of lighting to enhance safety and security to help in the prevention of crime and to allow activities like sport and recreation to take place with the need to:

- Protect the natural and historic environment including wildlife and features of the natural environment such as tranquillity;
- Retain dark skies where appropriate.
- Prevent glare and respect the amenity of neighbouring land uses.
- Reduce the carbon emissions associated with lighting.

Technical Advice Note (TAN) 16 - Sport, Recreation and Open Space

Paragraph 3.17 states that: 'In urban fringe areas, particularly where there is insufficient land in urban areas, there may be opportunities to provide sport and recreation facilities in ways which do not conflict with other policies to protect the environment and amenity of communities'.

Paragraph 3.18 states that: 'In rural areas, facilities should be located in or adjacent to settlements. Any proposed developments in the open countryside would require special justification. Appropriate proposals linked to farm diversification may be given favourable consideration.'

In terms of major sport and recreation facilities paragraph 3.20 of TAN 16 states:

'Wherever possible, major sport and recreation facilities like rugby, football, and athletics stadia should be located in, or adjacent to town centres, on sites which can contribute to town centre vitality and viability and are accessible by a range of transport modes. Where suitable sites in such areas are not available, consideration should be given to edge of centre sites, particularly those with good access to public transport, and preferably on previously developed land. Wherever such developments are located, consideration should be given to access arrangements and to the safety and amenity of residents, users and the public at large. Wherever possible, walking should be the primary means of access to such facilities, followed by cycling and the use of public transport, with private transport the least favoured option.'

In relation to Accessibility and Rights of Way TAN 16 in paragraph 3.39 requires '..major generators of travel demand to be located in, or close to town centres. Proposals to create new sport and recreational facilities, or to enhance existing facilities, could increase traffic and put greater demand on parking and public transport. In considering proposals for facilities which may generate high levels of travel demand, local planning authorities should use a sequential approach to development, locating such facilities in, or close to, town centres where possible.'

Paragraph 3.40 states that 'Safe cycle routes and footpaths which avoid busy roads and other potential hazards, can provide a positive recreational opportunity in themselves, as well as having the potential to link to wider open space corridors, play spaces or recreational facilities, particularly for children and young people. Promotion of walking and cycling helps to address issues related to climate change and is consistent with government sustainability

objectives such as improved health, safe routes to school, a reduction in car journeys and the encouragement of tourism.'

Paragraph 3.43 states 'The local planning authority should provide guidance in the LDP to ensure that sport and recreational facilities and open spaces are accessible by public transport, walking and cycling. Where this is not possible, authorities should consider the provision of suitable bus or rail services, or adequate parking for sport and recreation users, particularly where participants have their own, sometimes bulky, equipment. Children's play areas should usually be linked to housing areas by public paths and cycle routes, where personal safety and security can be more easily ensured.'

Noise

Paragraph 4.4 states that 'Local planning authorities should assess the compatibility of noise generating recreational and sporting activities with other uses. The siting, location and intensity of use of such activities should be given special regard in order to minimise their impact on the amenity of local residents and on the surrounding area. Local planning authorities need to balance the positive contributions of leisure pursuits to the area and user enjoyment, against local environmental quality and possible nuisance to other people.'

Paragraph 4.5 states that 'When dealing with planning applications for activities which have the potential to generate significant levels of noise, the frequency with which the noise occurs and the disturbance likely to be created should be taken into account by the local planning authority. Local planning authorities should also consider the cumulative effects of different activities in the same area on the local community and environment. The attachment of reasonable conditions to planning approval could be used to control noise emissions, particularly during unsociable hours.'

Paragraph 4.6 states that 'Some noise generating activities enjoy permitted development rights granted by Part 4 of Schedule 2 to the Town and Country Planning (General Permitted Development) Order 1995, and so may not require specific planning permission provided they occur on a temporary basis. However, permitted development rights may, if necessary, be withdrawn by making a direction under Article 4 of the Order.'

Lighting

Paragraph 4.7 states that 'The provision of floodlighting at sport and outdoor recreational facilities can allow for more efficient use of such facilities through extended opening hours. However, when determining planning applications, local planning authorities should ensure that the amenity of people living nearby is fully considered, and there is no unacceptable adverse impact on the character of the locality, including its visual amenity, or on features of nature conservation importance. Any permission granted may need to be subject to conditions, for example, limiting the hours during which the lights may be operated and/or the frequency of their use, or requiring the installation of downlighting, lit floorscapes, shielding or of particular types of light. Modern lighting systems can greatly reduce glare and stray light. They can be more energy efficient, particularly where they use power from renewable sources, and should be installed wherever possible.

Paragraph 4.8 states that: 'Providing lighting on urban walkways and major cycle routes can encourage a modal shift in travel patterns throughout the year, improving their attractiveness by enhancing the safety and security of users.'

The Development Plan

The starting point for decision making in planning is the Monmouthshire County Council Local Development Plan (LDP) 2011-2021 that contains the following relevant policies to this application:

- Policy S5 Community and Recreation Facilities
- Policy S7 Infrastructure Provision
- Policy S12 Efficient Resource Use and Flood Risk
- Policy SD3 Flood Risk
- Policy SD4 Sustainable Drainage Development
- Policy S16 Transport
- Policy RE6 Provision of Recreation, Tourism and Leisure Facilities in the Open Countryside
- Policy LC1 New Built Development in the Open Countryside
- Policy GI1 Green Infrastructure Development
- Policy NE1 Nature Conservation and Development
- EP1 Amenity and Environmental Protection Development
- Policy LC3 Brecon Beacons National Park
- Policy W1 Waste Reduction
- Policy MV1 Proposed Developments and Highway Considerations
- Policy MV2 Sustainable Transport Access
- Policy MV3 Public Rights of Way
- Policy MV4 Cycleways

All the aforementioned policies of the Development Plan have been carefully considered in preparing this planning application and are considered in further detail below.

6. Pre-Application and Community Engagement

Pre-application consultation The Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPWO) requires developers to consult the public on their proposals in respect of major development before submitting a planning application. Article 2C(1)(b) of the DMPWO requires information about the proposed application to be available for inspection at a location in the vicinity of the proposed development for not less than 28 days. As part of the measures introduced by the Health Protection (Coronavirus Restrictions) (Wales) Regulations 2020 premises usually used to hold hard copies of information or provide public computer facilities have had to close.

Therefore, Article 2F of the DMPWO sets out what must be included in a pre-application consultation report, to be submitted with a planning application. This includes a declaration of the notice given about the consultation undertaken. The Amendment Order requires developers to declare that the prescribed information was made available on a website in accordance with the requirements, whether hard copies were requested and that such

copies were supplied. The revised consultation arrangements will continue to apply to preapplication community consultations where at least one of the notice requirements in articles 2C(1)(a) and 2D(2) is given before the end of the emergency period. **The emergency period has been extended to 8th January 2021.**

7. The Proposal

Planning permission is sought for the development of the site for a 'Velo Park' comprising a closed road circuit with ancillary bicycle storage units (three cargo containers), car parking and street lighting.

8. Assessment of the proposal

It is considered that the principle of the development is dependent on the acceptability of the proposed sports/recreational facility on the application site which although is situated outside the settlement boundary is adjacent to it. Another consideration in this assessment is whether the site is located within the open countryside or within an urban-rural fringe setting.

In terms of the principle of development national planning policy is supportive of proposals that promote healthier places with paragraph 3.22 of PPW stating that:

'Planning authorities should develop and maintain places that support healthy, active lifestyles across all age and socio economic groups, recognising that investment in walking and cycling infrastructure can be an effective preventative measure which reduces financial pressures on public services in the longer term.'

In relation to development in the countryside PPW in paragraph 3.56 states that:

'Development in the countryside should be located within and adjoining those settlements where it can be best accommodated in terms of infrastructure, access, habitat and landscape conservation.' However, new building in the open countryside away from existing settlement or areas allocated for development plans must be strictly controlled'

In relation to the siting of major sport and recreation facilities paragraph 3.20 in TAN 16 states:

'Wherever possible, major sport and recreation facilities like rugby, football, and athletics stadia should be located in, or adjacent to town centres, on sites which can contribute to town centre vitality and viability and are accessible by a range of transport modes. Where suitable sites in such areas are not available, consideration should be given to edge of centre sites, particularly those with good access to public transport, and preferably on previously developed land. Wherever such developments are located, consideration should be given to access arrangements and to the safety and amenity of residents, users and the public at large. Wherever possible, walking should be the primary means of access to such facilities, followed by cycling and the use of public transport, with private transport the least favoured option.'

In terms of the principle of development the relevant LDP policies are the following:

- Policy S5 Community and Recreation Facilities
- Policy RE6 Policy RE6 Provision of Recreation, Tourism and Leisure Facilities in the Open Countryside
- Policy LC1 New Built Development in the Open Countryside

Policy S5 allows for Community and Recreation Facilities Development proposals that provide and/or enhance community and recreation facilities to be permitted within or adjoining town and village development boundaries subject to detailed planning considerations. The policy also requires new facilities to have good access to public transport, as well as being within walkable distance to as many homes as possible. It is considered that the proposal satisfies this policy with the site being adjacent to settlement boundary of Llanfoist which is itself on a regular bus route. The site is also located within 1.5 miles south of Abergavenny Town Centre, approximately 25 minutes walking / 10 minutes cycling distance.

An Active Travel Assessment accompanies the planning application and considers that from the application site that:

'...the routes to Llanfoist Fawr Primary School, Abergavenny High Street, Abergavenny Bus Station and Abergavenny Rail Station are generally suitable for walkers, although improvements can be made to the routes surface, crossings and legibility to further encourage walking. The routes for cyclists require dedicated facilities, improved surface quality and improvements to the legibility of the network to encourage increased cycle use. However, the routes are considered suitable for use by experienced cyclists such as those intending to cycle to travel to ride at the Velo Park.'

Both LDP policies RE6 and LC1 support the provision of recreation, tourism and leisure facilities even within the open countryside if proposals are of a suitable scale, informal nature and are sympathetic to the character and appearance of the countryside. The definition of open countryside is defined in paragraph 3.56 of PPW as being '.....away from existing settlements or outside areas allocated in the development plan.'

The application site is positioned in a mixed-use area adjacent to a junction of the A465 Heads of the Valleys Road. The area around the road junction has been developed in recent years to accommodate new housing, a residential care home, roadside leisure/retail operators including a hotel, restaurant, and drive-through restaurants. Therefore, the site is not considered to be in the open countryside but rather in an urban-fringe setting and consequently the scale and nature of the proposal is in character with its setting.

Development of urban fringe sites such as this for sports and recreation are supported in TAN 16 in paragraph 3.17 which states that 'In urban fringe areas, particularly where there is insufficient land in urban areas, there may be opportunities to provide sport and recreation facilities in ways which do not conflict with other policies to protect the environment and amenity of communities'.

The car parking area and bicycle storage units proposed would be located at the northern end of the site adjacent to existing buildings. The road track and lighting columns would extend south into an area that still has the character of an urban fringe setting adjacent to existing development and capped landfill site. It is considered that the principal of a sports

and recreation facility located on the proposed site within an urban – fringe setting is acceptable, and the proposal satisfies LDP policies S5, RE6 and LC1.

Landscape and Visual Impact

The Landscape and Visual Impact Appraisal (LVIA) that accompanies this planning application notes that the Site does not fall within any landscape related designations and it assesses the impact of the proposal on the character of the countryside and also in the context of the Brecon Beacons National Park.

The LVIA concludes that the proposed facility would not have a significant visual impact on the landscape with the most prominent features including the car park and storage units proposed to be situated in the northern part of the site which is adjacent to existing buildings. The light stands would be designed to minimise their impact upon the wider landscape including views from the BBNP and would not normally be use after 9pm in the evening in order to minimise their impact.

The photomontages in the Landscape and Visual Impact Appraisal demonstrate how views of the site from vantage points particularly from the slopes of the Blorenge would show it in the context of the backdrop of the townscape of Abergavenny, the A465 as well as the adjacent built up environment of Llanfoist.

The pond situated to the west of the application site is protected as an Area of Amenity Importance (LDP policy DES2) where no unacceptable adverse impacts are permitted.

Green Infrastructure

In accordance with LDP Policy GI1 a Green Infrastructure Strategy has been produced which sets out detailed GI assets and opportunities for the Abergavenny and Llanfoist area. Also included is the overarching Green Infrastructure network plan which highlights the site and its immediate surroundings as having Habitat Connectivity Opportunities which support the additional works which are proposed.

Landscape / ecological structure and connection

The existing boundaries and edges are a key asset in terms of ecological and landscape value. The proposals reinforce these elements to create substantial continuous hedge-lines and woodland belts that will expand and connect habitats, and provide landscape enhancement and visual screening. Their arrangement will also help to repair the local landscape character.

Integrated drainage, habitat creation and connectivity

The interior elements of the site also provide extensive opportunities for habitat creation, and the proposals include areas of wildflower meadow, low scrub, and small groupings of trees. The landform will include slopes and undulations, together with areas of stone, boulders and log piles. The SuDS drainage will provide a network of routes to help direct amphibians towards tunnels which pass under the cycle track, to aid their safe migration.

Integrated recreation routes and facilities

The proposals include the diversion of two public rights of way and additional new connecting routes. Increased accessibility is also supported through the installation of pedestrian gates, well constructed paths and gentle gradients. The experience of visiting the area is enhanced through substantial improvements to the integrity of the landscape and provision for informal recreation including seating, play, boardwalks, nature observation and interpretation.

Trees

An arboricultural survey was carried out in the spring of 2020. The findings of the report have been incorporated into the GI Strategy and any recommended works should form part of an ongoing maintenance strategy. Any trees of particular merit have been noted and where necessary, additional protection measures would be set out.

No trees of importance are proposed to be removed.

Transport and Parking

A Transport Assessment (TS) accompanies the planning application and in addition to this an Active Travel Audit (ATA) and Event Management Plan (EMP) have been produced. The TS has demonstrated the following:

- A review of the local highway network and collision data in the vicinity of the site indicates that there are no apparent problems in relation to the current operation or safety of the local highways;
- The proposed site access arrangements comply with MCC guidance so that safe and suitable access can be achieved;
- Proposed parking provision on-site will accommodate the proposed demand and will therefore ensure that there is no adverse impact upon the local highway network; and
- Forecast trip attraction indicates an immaterial increase in traffic movements during the proposed development's peak hours of operation, with no anticipated severe impact on the local highway network (in particular, the Iberis Road / LHWRC Access Road Roundabout Junction).

The EMP is a key document for the safe management of traffic and parking on the small number of occasions across the year that a major cycling event is held. It provides information in relation to the operational periods, parking arrangements, nearby complimentary services and facilities, and typical event management procedures, which will all serve to minimise the highways and transportation impacts associated with the regional / national events hosted by the Velo Park on an infrequent basis.

The TS concludes that approval of this planning application will not result in a severe impact upon the safety or operation of the surrounding local highway network, and as such there are no significant highways and transportation matters that should preclude the local planning authority from recommending approval of this planning application.

Ecology

A series of ecological surveys have been undertaken since June 2019 that identified that the site predominantly comprised semi-improved grassland with an area of marsh grassland divided by narrow corridors of broadleaved woodland and dense scrub and ditches containing running water. Great Crested Newts and bats have been recorded on site and the green infrastructure concept plan has been developed in consultation with the project ecologist to ensure maximum protection and habitat connectivity/creation is afforded to this species.

To support the proposals, a Preliminary Ecological Appraisal was undertaken in 2019. Further survey effort was recommended following this initial survey which included survey for great crested newts, reptiles and bats. This further survey work was undertaken in 2020.

Reptiles are present on site and measures have been taken in the design of the circuit and in particular the landscape and green infrastructure to retain and provide enhancements to the habitats.

Great Crested Newts – the survey concluded based on the evidence found, that it's unlikely that there is a moderate population present. In accordance with the recommendations the scheme has been designed which ensures that suitable high quality features will be included that will be managed and monitored adequately by MCC. Amphibian underpasses will be installed under the track, hibernation and safe haven opportunities will be provided inside the track, and the remaining grasslands quality maintained and improved.

Bats - activity occurs principally along the dark fringes of the site which are made up of hedgerows and treelines and are planned for retention. The light spill from the proposed velo park into these existing zones of dark vegetated habitat has been minimised.

The lighting design has taken all necessary steps to achieve the performance criteria required by British Cycling design guidance as well as limit the environmental impact outside of the circuit area following environmental guidance produced by the Bat Conservation Trust/Institute of Lighting Professionals (Bats and Artificial Lighting in the UK – Guidance Note 08/18)

- No street lighting for the western area of the circuit to minimise environmental impacts in the area closest to the pond and to maintain dark corridor
- Specification of extra warm white lighting colours (warm white 2200k LEDs) to minimise impacts on bats and reptiles
- Full cut off internal louvres fitted to all track lighting for full light cut off behind luminaire.
- Minimising and avoiding where possible lighting on key habitats and features. The light spill outside of the circuit surfaced area would be below 1 LUX and achieves acceptable ecological standards.

It is considered that the proposed development satisfies LDP Policy NE1 – Nature Conservation and Development.

Flood Risk and Drainage

A Flood Consequence Assessment has been prepared for the site which concludes that the site is compliant with the indicative consequences of flooding as set out in A1.14 and A1.15 of TAN15. The consequences of flooding can be acceptably managed for the lifetime of the development recognising the small-scale proposal on the edge of floodplain. The development proposals should therefore be considered by the LPA to satisfy the Justification Test and the Acceptaibility Criteria as set out in TAN15.

It is considered that a 'velo park', would be expected to remain dry in all but the most extreme conditions. The proposed development will provide betterment compared to the existing situation. Providing the recommendations made in this FCA are instigated, flood risk from all sources would be minimised, the consequences of flooding are acceptable, and the development would be in accordance with the requirements of TAN15. The FCA demonstrates that the proposed development would be operated with minimal risk from flooding, would not increase flood risk elsewhere and is compliant with the requirements of TAN15. The FCA concludes that the development should not therefore be precluded on the grounds of flood risk. It is also considered the proposal satisfies policy SD3 of the LDP.

Heritage and Archaeology

There are no designated or undesignated heritage assets recorded within the Site. There are no applicable Scheduled Monuments, Registered Parks and Gardens, or World Heritage Sites that would be affected by the Proposed Development. Whilst there are various listed buildings, locally listed buildings and a Conservation Area within one kilometre of the Site including a Grade II listed building (Racecourse farmhouse) approximately 150 metres to the south east of the site, no impact on their settings has been identified resulting in a neutral effect of the proposal.

A preliminary assessment has been made of the potential for heritage assets with an archaeological interest to be present on the Site, based on the known archaeological remains that are presently recorded in the vicinity. The potential for archaeological activity relating to non-agricultural activity has been assessed as low or low-moderate for all periods up to the medieval period. It is noted, however, that no intrusive archaeological investigations have previously taken place within the Site and the possibility remains that the area was undeveloped or in agricultural usage during these periods. From the Medieval to Post-medieval periods the Site is likely to have been in agricultural use. Nonetheless, the groundworks associated with the proposed development although very shallow have the potential to adversely impact on any buried archaeological features that may be present. At the discretion of the Council a suitable programme of archaeological investigation is therefore recommended. Any such works may result in the requirement for further archaeological mitigation; suitable mitigation strategies including preservation by record and/or preservation in situ should result in a negligible impact effect.

Utilities

The proposed development is within the Consultation Distance of a high pressure pipeline that runs across the site. The only element of the proposal that would be located over the pipeline would be the road track itself. In accordance with the Land Use Planning Consultation with Health and Safety Executive, Town and Country Planning (Development

Management Procedure) (Wales) the Health and Safety Executive (HSE) has been consulted for the development is within the Consultation Distance of Major Hazard Sites/ pipelines. This consultation, has been considered using HSE's planning advice web app, based on the details input on behalf of Sir Fynwy - Monmouthshire. The HSE does not advise, on safety grounds, against the granting of planning permission in this case.

Wales and West Utilities been consulted and a monitoring plan when construction has commenced would be put in place.

9. Conclusions

This Planning Statement supports the submission of a planning application seeking permission for velopark/closed road circuit at the application site. A facility of this kind would be used to introduce more people including school children in the area to cycling either in terms of recreation/sport or as an alternative to the car to travel to work/school transport in line with the aims of the Active Travel Act (2013). The facility would not only be used for cycle training and racing but also as a place where people can enjoy riding a bike in a safe environment and learn cycling proficiency skills that will improve their confidence for riding on the roads.

The proposal is considered in accordance with national and local planning policies in relation to its purpose and function. The site itself is considered to be acceptable in terms of the potential impacts of the facility within its boundary but also the potential impacts the surrounding area including upon the wider landscape, wildlife and neighbouring uses.

OTHER RELEVANT LEGISLATION, PLANS AND STRATEGY

Active Travel (Wales) Act 2013

This Act makes provision for Local Authorities authorities to provide maps of existing active travel routes and related facilities; as well as integrated network maps of the proposed active travel routes and related facilities over the next fifteen-year period. Monmouthshire County Council has been compliant with the Active Travel Act legislation; both the existing routes map and integrated network map were approved by the Secretary of State for Transport in Wales. Moving forward, the council will annually report on active travel progress and its uptake across the county to ensure the provision for walkers and cyclists is continually improving.

The Wellbeing of Future Generations Act (Wales) 2015

The Well-Being of Future Generations Act 2015 aims to make "long-lasting, positive changes to both current and future generations". Long-term benefits associated with an increased uptake of active modes may include creating a healthier population and reducing the impact transport has upon the environment by encouraging travel by bicycle instead of more polluting modes. The strategy also provides opportunity to adhere to the goal of Cohesive Communities, helping to combat transport poverty by reducing the reliance on the private motor vehicle via means of providing the opportunity to travel safety via active modes between, often isolated, rural communities.

Regional

Regional South East Wales Transport Alliance Regional Transport Plan - March 2010

The vision of this plan is to provide a "modern, accessible, integrated and sustainable transport system for South East Wales" in which cycling is included. The plan aims to ensure the provision of continuous high-quality cycle infrastructure. Investing in active travel in South East Wales – Sustrans The paper sets out the possible scenarios for investments in active travel in Newport, Cardiff and Monmouthshire. In Monmouthshire, the investment programme includes new and improved active travel routes, routes to schools and improved cycling facilities at rail stations and bus terminals.

Cardiff Capital Region City Deal

The Cardiff Capital Region is comprised of ten local authorities, including Monmouthshire. The City Deal highlights the Regional Transport Authority which will co-ordinate transport planning and investment in the region. This Transport Authority is responsible for pooled local transport resources and regional planning for the local transport network which could involve cycling measure.

Welsh Cycling Strategy, 2013 – 2020, Welsh Cycling

The Welsh Cycling Strategy outlines four corporate outcomes, as follows: I. Every child to be able to cycle; II. More people having the opportunity to cycle and achieve their personal goals: III. Welsh cyclists achieving international success; and IV. Providing an effective and sustainable organisation that provides leadership and advice to those with an interest in cycling. At present, the Welsh Cycling Strategy is currently being updated to reflect the changing political and sporting landscape as well as progress of policies including the Wellbeing of Future Generations (Wales) Act 2015, Vision for Sport, Sport Wales Strategy, British Cycling Strategy and Active Travel (Wales) Act 2013.

Local Policy

Monmouthshire Local Transport Plan

The Monmouthshire Local Transport Plan aims to "facilitate and support the development of a modern, accessible, integrated and sustainable transport system for South East Wales". To achieve this aim, the plan looks to provide cycling as a real travel alternative amongst other options and making greater use of the National Cycle Network routes that run through the region.

Monmouthshire Public Service Board Well-Being Plan

The Monmouthshire Public Service Board Well-being Plan (Fig 5.1) outlines four well-being objectives: I. Provide children and young people with the best possible start in life; II. Respond to the challenges associated with demographic change; III. Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change; and IV. Develop opportunities for communities and businesses to be part of an economically thriving and well-connected county. Cycling is part of achieving the objective focusing on the environment and climate change, through the promotion of Active Travel to reduce air pollution and have significant health benefits.

Monmouth County Council Public Rights of Way Improvement Plan (ROWIP)

The Rights of Way Improvement Plan for Monmouthshire encourages projects that involve cycling to/from school to promote the health benefits of cycling and countryside access. Cycling is beneficial to the local economy of rural areas, with the ROWIP highlighting the financial importance of off-road cycle provision and the National Cycle Network routes that currently run through Monmouthshire,

Monmouthshire Cycling Strategy (April 2019)

The strategy links to relevant local, regional and national agendas aimed at increasing sustainable modes of travel, as well as improving the health and well-being of communities by placing greater emphasis on cycling. Also, it aims to build on recent national and international events, increased promotion of road safety in primary and secondary schools, as well as compliance and promotion of the Active Travel (Wales) Act 2013.