

JMS PLANNING & DEVELOPMENT

GREEN INFRASTRUCTURE STATEMENT

REDEVELOPMENT OF FOOTBALL GROUND, RESIDENTIAL DEVELOPMENT AND ASSOCIATED WORKS

ABERYSTWYTH TOWN FOOTBALL CLUB
PARK AVENUE STADIUM,
ABERYSTWYTH,
CEREDIGION,
SY23 1PG



Client: Aberystwyth Town Football Club

Project: ATFC Redevelopment

Date: November 2024

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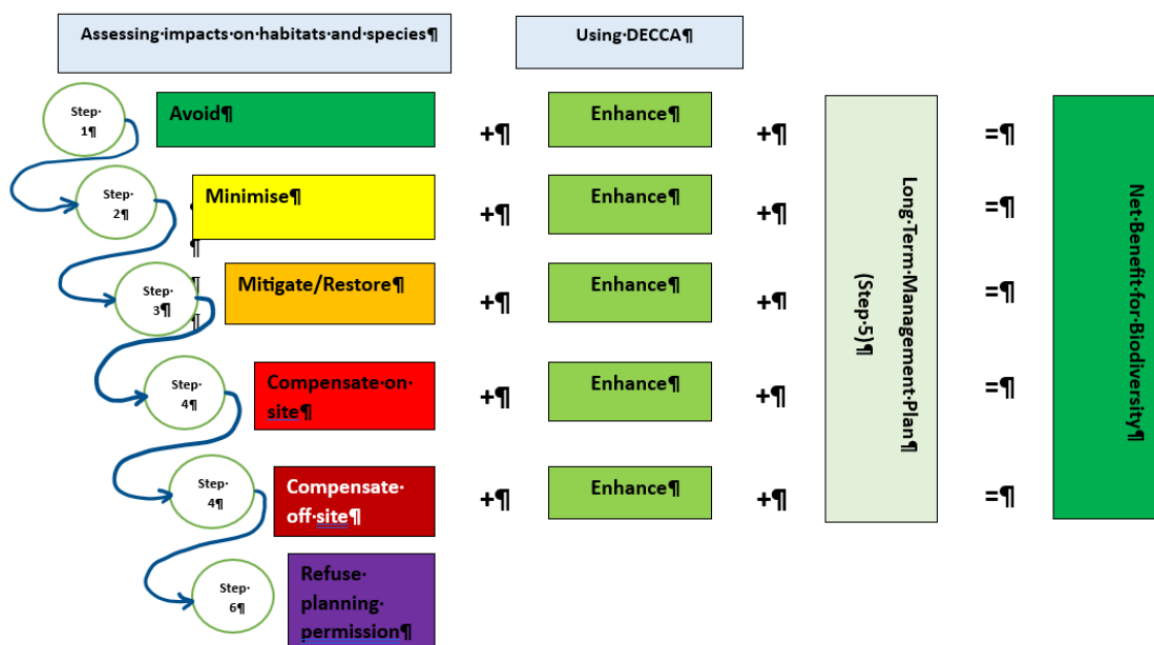
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SECTION I: INTRODUCTION

- 1.1 JMS Planning & Development have been instructed, by Aberystwyth Town Football Club (the applicant) to submit a Green Infrastructure Statement following the amendment to Planning Policy Wales (Ed 12), Chapter 6 (Feb 2024) in support of the redevelopment of the football ground, residential development and associated works
- 1.2 PPW states that Green Infrastructure Statements (GIS) should be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal.
- 1.3 PPW also states that for minor development this will be a short description and should not be an onerous requirement for applicants, however, the GIS should positive multi-functional outcomes which are appropriate to the site.
- 1.4 The step-wise approach has been used throughout this assessment.

Figure 1X: Summary of the Step-Wise Approach



The Step-Wise Approach



SECTION 2: SITE AND SURROUNDING AREA

- 2.1 The application site is located entirely within the settlement boundary of Aberystwyth, which is designated as one of the ‘main 6 towns’ of Ceredigion, as described within the Local Development Plan and defined as Urban Service Centres (USC). These six towns, are deemed the focus of LDP strategy owing to their diverse range of services and facilities playing a strategic role for the county.
- 2.2 The settlement of Aberystwyth is the largest town in Ceredigion, and one of the largest towns of the Mid Wales Region, with an estimated population of 71,300 in 2022 (Source: Office for National Statistics). Aberystwyth is considered one of the most sustainable locations within Ceredigion and plays a strategic regional role owing to the presence of large-scale services and facilities, such as the University, Bronglais Hospital, National Library of Wales, to name a few.
- 2.3 The town also has a pivotal function of employment within the area, thus providing numerous jobs from employers such as Ceredigion County Council, National Resources Wales and Welsh Government, amongst a wide array of smaller businesses.
- 2.4 Owing to its seaside location, Aberystwyth is a popular holiday destination, which aids the tourism and leisure industries, and provides significant economic benefits to the area.
- 2.5 Aberystwyth is considered the main hub for transport, with public transport links offering services via bus and train, allowing a more sustainable means of access to wider areas such as North Wales (via Dovey Junction to Pwllheli), and a direct service to Shrewsbury, which offers more services to cities and towns across Wales.



- 2.6 The application site specifically, is located within the ATFC ground, which falls within the mixed use allocated site area, reference MO303, whereby the settlement group statement of the LDP notes that the redevelopment of the community provision and residential development may be acceptable.
- 2.7 The site in total, measures approximately 1.3 hectares (3.2 acres), which includes the existing football pitch, clubhouse and changing facilities, gantry, seating and standing facilities, car parking areas and the existing residential units to the South/South-East of the site.
- 2.8 In the surrounding area there is a wide variety of uses. To the North, Maesyrafon Car Park offers excellent parking facilities, and beyond that are residential dwellings of Greenfield Street. To the East, Ystwyth Retail Park offers a range of shops and further parking. The West of the site is bound by a foot and cycle path which runs alongside the Afon Rheidol. The South of the site is bound by a partly private road which serves the Police Station and Army Reserve Centre.
- 2.9 The application site falls within Zone C1 of the Development Advice Maps (DAM) as contained in Technical Advice Note (TAN) 15: Development and Flood Risk (2004) and the latest mapping available, Flood Map for Planning (FMfP), highlights the application site is located within Floodzone 3, however, the site does fall within the TAN15 defended zone. The application includes a Flood Consequence Assessment which should be read in conjunction with this statement.
- 2.10 For the avoidance of doubt, the application site does not fall within statutory designated areas such as SSSI, SPA, SAC's (although would be considered hydrologically connected), or the Aberystwyth Conservation Area. In addition, there are no nearby listed building properties that will be negatively impacted.



2.11 The table below assesses the site in terms of its features:

Feature	Assessment
Geodiversity (RIGS)	No designation / No Impact
National Landscape Character	<p>NLCA23 - Rheidol & Ystwyth Hills & Valleys.</p> <p>This is the landscape of Aberystwyth and its hinterland. It is the area between mountains and sea, whose rivers converge near the town. Within their relatively short length, the rivers tumble dramatically from the adjacent Pumlimon massif, often in steep-sided, wooded gorges, being some of the best examples in Wales. They emerge to become gentle, sometimes braiding lowland rivers, flowing through a landscape of thick hedges and improved pastures, before meeting the sea abruptly around Aberystwyth. Intervening ridges straddle the upland-lowland divide, some being enclosed, others afforested or open. Long views are gained from them, out across the sea in Cardigan Bay.</p>
Historic Landscape	<p>Value - Outstanding</p> <p>This is the built-up area of Aberystwyth and Llanbadarn. It includes the old centres of these two settlements, modern housing development, institutions such as the university and National Library of Wales and industrial estates. Tourist/leisure facilities such as sports fields and a golf course are included. The area currently includes 298 HERs and/including 247 LBs, 2 SAMs: Aberystwyth castle and harbour defences.</p>
Visual and Sensory	<p>Value - Moderate</p> <p>Coastal resort and university town set on sloping land, with the traditional Georgian and Victorian core of the settlement located north of the mouths of the Rheidol and Ystwyth rivers. The town fronts onto rocky bays to the west. Older buildings comprise 2, 3 and 4 storey</p>



	<p>terraces built of stone or render faced brick, and arranged in rectilinear patterns. Focal points include the commercial centre, with recently pedestrianised areas, the recently upgraded marina with new apartments and the university set on rising land to the north. The settlement is generally well contained with a sharp divide between urban and rural areas. Adjacent countryside generally retains its structure and integrity, although areas where an urban fringe is developing include the Rheidol valley and along the A487, where development threatens to break the skyline. Change detection 2014: many new developments including in Rheidol valley along approaches, forming unattractive approaches.</p> <p>Town has declined in popularity as a resort, and newer development has occurred which generally relates less positively to the core of the settlement. The core remains attractive in parts.</p>
Geological Landscape	<p>Value - Low</p> <p>Area of intensive urban development: few natural features remain.</p> <p>Main urban development of the lower part of Aberystwyth town, mainly utilising a glacial deposit, terrace-like feature at the end of the Rheidol valley but probably also on former floodplain / saltmarsh areas (Quaternary, Pleistocene-Holocene). Includes some minor areas of Lower Silurian bedrock.</p>
Landscape Habitats	<p>Value - Moderate</p> <p>Aberystwyth has a good proportion of green space including a Local Nature Reserve. The beach and harbour are important for marine mammals and bird species and a large list of rare plants has been recorded from around the town. All</p>



	<p>this adds to the biodiversity interest despite the density of development.</p> <p>This urban area has a good proportion of green space and a Local Nature Reserve, the area supports a wide range of important species, both marine mammals and birds and rare plants. All this gives the area a moderate biodiversity interest despite the density of development.</p>
Cultural Value (LANDMAP)	<p>Sense of place/ local distinctiveness - Moderate</p> <p>Approximately 49% of people in the area identify as Welsh.</p> <p>Approximately 59% of people in the area speak Welsh.</p>
Agricultural Land Classification	U



SECTION 3: GREEN INFRASTRUCTURE

- 3.1 Green infrastructure is necessary not just to soften the impact that development has on our natural environment, but to ensure that it contributes a biodiversity net gain that results in an enhancement of the site compared to the pre-development baseline.
- 3.2 Ensuring that there is a suitable network of green infrastructure is a key concern as not only will it benefit local flora and fauna, but also the people which reside in areas with larger amounts of green infrastructure as a means of contributing to better health and well-being.
- 3.3 Green infrastructure must consider the local context and character as taking design cues from local habitat types while also serving local community needs.
- 3.4 Green infrastructure must deliver public benefits for all both directly and indirectly, including recreational and health and wellbeing benefits.
- 3.5 The application site mainly comprises of hand standing areas and the football pitch. However, there is scope to provide much needed green infrastructure at the site. PPW notes that green infrastructure is not limited to focusing on landscape and ecology, rather, consideration should be given to all features of the natural environment. Recreational spaces, such as this, is considered to contribute to the area's green infrastructure which promotes social, mental and physical well-being.
- 3.6 PPW acknowledges that green infrastructure can be formed by many different components of varying scale, from large scale wetlands, through to small scale urban interventions. The proposal includes both natural and semi-natural forms of green infrastructure, from new grassed and planted areas to sustainable drainage systems and enhanced public footpath networks.
- 3.6 The application site abuts an existing footpath which runs parallel to the Western boundary of the site and the Afon Rheidol. The scheme proposes a footpath widening operation which will benefit the wider community, allowing safer and easier passage along the narrower pinch-points of the footpath.



Thus, creating a more user-friendly footpath which is more likely to be used, therefore promoting the uptake of more active travel means of transport.

- 3.7 The developer is committed to improving the overall well-being and health of the community and the environment by enhancing biodiversity on site and encouraging green infrastructure.



SECTION 4: BIODIVERSITY NET BENEFIT

- 4.1 The annexe to the letter by the Chief Planning Officer dated 11th October 2023 explains that:
- “Biodiversity underpins the structure and functioning of ecosystems. It is the diversity of living organisms whether at the genetic, species, habitat or ecosystem level. An ecosystem is made up of living organisms, plants, animals and micro-organisms, in conjunction with their non-living environment, air, water, minerals and soil, and all the diverse and complex interactions that take place between them.”
- 4.2 **Extent:** The Pre-Application Consultation (PAC) highlights that the proposal is for the redevelopment of the existing football ground, residential development and associated works within the Urban Service Centre of Aberystwyth. The site is of little to no ecological value, with limited suitable habitats for priority species. The applicant understands the need to plan for every individual development proposal to avoid negative impact on existing biodiversity and is committed to maintaining and enhancing biodiversity on the site. The proposal is likely to have no impact on ecology and there is no existing flora and fauna on site.
- 4.3 **Condition:** The site is located within a very urban and built-up area and devoid of ecologically significant trees, hedgerows and habitats. The site mainly comprises of hard standing areas and the buildings attributed to the football club, such as the main spectator stand, changing rooms, clubhouse, gantry and other ancillary buildings, many of which are currently in a state of deterioration and require replacement. A preliminary protected species assessment was undertaken and concluded that the site, and various buildings were unsuited to protected species and that the intended development is unlikely to have an ecological consequence.
- 4.4 **Connectivity:** Opportunities will arise for the development to be connected to the biodiversity and ecological networks which exists currently on and around the application site. The proposal includes a large public open space to the Western aspect of the site, which measures approximately 250 square meters. When a formal application is submitted, a landscaping plan will be included to highlight the planting associated within this area. The landscaping will include



new grassed areas with native planting of shrubs and ornamental flowers, thus creating new habitats and foraging grounds which will connect to the nearby grassed riverbanks. The proposal will improve connectivity for pedestrians with a footpath widening scheme, which merges with the public open space, creating a well-designed and legible space which connects the social and ecological environment.

- 4.5 **Adaptation:** Sustaining the habitats and associated species in the longer term is key, through proper management of the site and by securing the green infrastructure already present around the site and promoting its use into the future.



SECTION 5: PROTECTION OF SITES OF SPECIAL SCIENTIFIC INTEREST

5.1 The site does not form part of land within a Site of Special Scientific Interest.



SECTION 6: TREES AND WOODLANDS

- 6.1 The annexe to the letter by the Chief Planning Officer dated 11th October 2023 explains that:
- “Trees, hedgerows, groups of trees and areas of woodland are of great importance for biodiversity. They are important connecting habitats for resilient ecological networks and make an essential wider contribution to landscape character, culture, heritage and sense of place, air quality, recreation and local climate moderation. They also play a vital role in tackling the climate emergency by locking up carbon, and can provide shade, shelter and foraging opportunities, wider landscape benefits such as air and diffuse pollution interception, natural flood management, and building materials. The importance of trees, in particular urban trees, in creating distinctive and natural places which deliver health and well-being benefits to communities, now and in the future should be promoted as part of plan making and decision taking. Planning authorities must promote the planting of new trees, hedgerows, groups of trees and areas of woodland as part of new development.”
- 6.2 There are currently no trees within the application site, although there are trees dotted around the area and in public parks within Aberystwyth. No trees will be affected by the proposal and the site is not suitable for planting of new trees.



SECTION 7: CONCLUSION

- 7.1 To conclude, the development of the application site will not result in damage or a negative impact on biodiversity or on the function of existing ecosystems. The site is located on land which is of no ecological value on an existing site in an urban environment.
- 7.2 The application site provides an opportunity to deliver a net benefit of biodiversity in its redevelopment with the inclusion of various green infrastructure components, such as natural green open spaces, new native planting, sustainable drainage systems and renewable sources of energy.
- 7.3 The proposal has followed the step-wise approach in accordance with PPW and it is considered that the proposed enhancements are commensurate with the size, scale and nature of the development given its urban location.