TOMPKINSTHOMAS

Planning Statement

LEISURE, COMMUNITY AND COMMERCIAL DEVELOPMENT

Hay Community Campus, Forest Road, Hay-on-Wye, HR3 5BT

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1. The Application and Background

1.1 Introduction

1.1.1 This Planning Statement is prepared by Tompkins Thomas Planning on behalf of HADSCAL Ltd ('the applicant') in support of an application seeking full planning permission for a community, leisure, and commercial development on land to the west of Forest Road, Hay-on-Wye.

1.1.2 The site is within the settlement boundary for Hay-on-Wye and is designated for existing community use via LDP Policy 50.

1.1.3 In addition to this statement, the application is accompanied by:

- Location Plan
- Full Suite of Proposed and Existing Drawings (CO2 Architecture)
- A "flyover" of the proposed model (CO2 Architecture)
- Design Statement (CO2 Architecture)
- Preliminary Ecological Survey with Preliminary Roost Assessment (Focus Environmental)
- Construction and Environmental Management Plan (Focus Environmental)
- Tree Survey and Arboricultural Impact Assessment (Focus Environmental)
- Tree Protection Plan (Focus Environmental)
- Bat Survey (Aware Ecology)
- Sustainability Statement (Red Six)
- Drainage Strategy (K-Ten)
- Drainage Layout (K-Ten)
- Landscape and Visual Appraisal (MHP Design)
- Landscape Strategy (MHP Design)
- Green Infrastructure Statement (MHP Design)
- Transport Assessment (Rappor)
- Framework Travel Plan (Rappor)
- Travel Plan (Rappor)
- Lighting Strategy (IJF).

1.1.4 The submission follows the receipt of supportive pre-application advice from the National Park Authority and extensive community consultation, including Pre-Application Consultation.

2. The Site and it's context

2.1 The site

2.1.1 The application site comprises an area of land on the southern side of Hay-on-Wye. It forms part of the wider HADSCAL landholding, which includes the adjoining football club and associated recreational land.

2.1.2 It is an irregularly shaped parcel of managed grassland which is generally open in character. It rises very gradually towards a high point along its southern boundary. Beyond the site, the landform rises more noticeably as it enters the lower slopes of the hills to the south.

2.1.3 The site boundaries are predominantly formed by established hedgerows and associated vegetation. A drainage ditch runs along the northern boundary.

2.1.4 The arboricultural survey identifies a mixture of hedgerows, individual trees and small groups of trees around the site, including coppiced hazel and hawthorn along the southern boundary and a thicker group of smaller trees and understorey vegetation adjoining Forest Road to the east. There are some self-seeded trees within the site.

2.2 Site setting

2.2.1 The site is within an established area of sporting and recreational uses. The wider HADSCAL landholding accommodates the football club, whilst the site is contiguous with other leisure and community uses including Hay-on-Wye Cricket Club, Hay-on-Wye Bowling Club, tennis courts and children's play area.

2.2.2 Access to the site is available from Forest Road, which runs along its eastern side. Forest Road connects Hay-on-Wye with the tourist destinations of Hay Bluff and the Gospel Pass. Forest Road accommodates a range of established employment, commercial and community uses in the vicinity of the site.

2.2.3 Hay-on-Wye Medical Centre is situated immediately to the north of the site on the same side of Forest Road. Greenfield Industrial Estate is to the south-east and on the opposite side of the road, whilst Drover Cycles is due east and Haytaxi is to the north-east.

2.2.4 Development is therefore established along both sides of Forest Road in the immediate vicinity

of the site and, on the eastern side of Forest Road, extends further south than the application site. The site does not, therefore, extend beyond the existing southern extent of built development along this part of Forest Road.

2.2.5 Beyond the site to the south and west, the landscape is predominantly agricultural, comprising fields defined by established hedgerows and mature vegetation. The Login Brook lies approximately 150 metres to the west of the site.

2.2.6 The site consequently occupies a transitional location between the built and recreational uses associated with Hay-on-Wye and the wider countryside to the south and west.

2.3 Hay-on-Wye

2.3.1 Hay-on-Wye is a market town situated on the England-Wales border, within the Bannau Brycheiniog National Park. The town has a well-defined built form centred around its historic core, with more modern residential, employment and community development extending outwards, including along Forest Road to the south.

2.3.2 The town provides a good range of services and facilities serving both its residents and the surrounding rural area. These include shops, schools, healthcare facilities, pubs and restaurants, employment opportunities and a range of community and recreational facilities.

2.3.3 The town is particularly well known for its concentration of independent bookshops and the annual Hay Festival, which contribute to its wider tourism and economic role. The application site lies on the southern side of the town, close to a number of these established community, recreational and employment uses. There is a continuous pavement between the site and Hay-on-Wye town centre.

2.4 Local designations

2.4.1 The site lies within the Bannau Brycheiniog National Park but is not subject to any other environmental or landscape designations.

2.4.2 The site is located within Flood Zone 1 and is therefore at the lowest risk of fluvial flooding.

2.4.3 A Public Right of Way crosses the north-westernmost part of the site before continuing across the adjoining football pitches and thereafter southwards.

2.4.4 An Order was made more than 15 years ago to divert the Public Right of Way around the site. It appears, however, that despite the considerable period which has since elapsed, the Order has not been confirmed by Powys County Council. The definitive route therefore remains unchanged.

2.4.5 There are no listed buildings within or in close proximity to the site. The Hay-on-Wye Conservation Area lies approximately 140 metres to the north of the site at its nearest point. The site is separated from the Conservation Area by intervening development.

2.5 Planning History

2.5.1 There is no planning history for the site.

2.5.2 There are two planning applications relating to Hay-on-Wye Football Club beyond the site boundary to the west. They are:

- 16/13163/FUL which permitted the erection of a spectator stand for the club on 23rd March 2016;
- 23/22011/FUL which permitted the erection of a new club facility comprising changing rooms, showers and a refreshment area on 6th October 2023.

2.5.3 The proposals do not affect those applications directly, however, the scheme does include changing facilities for the football club.

2.5.4 An application associated with the Doctors Surgery 21/20444/FUL permitted the erection of an extension to the Doctors' Surgery to enable the creation of an additional four consulting rooms on 6th January 2022.

2.5.5 Pre-application advice was carried out in respect of the proposed development and is discussed in the next chapter.

3. Pre-application engagement

3.1 The authority's advice

3.1.1 Pre-application advice was sought from Bannau Brycheiniog National Park Authority in respect of the redevelopment of the HADSCAL landholding. The Authority issued its written response on 2nd July 2024 under reference 24/22916/PAYPRE. The proposal included new community facilities, a community growing area, multi-use games area, pump track, fitness facilities and business units fronting Forest Road.

3.1.2 The advice was positive in respect of the principle of development. The Authority recognised that the site lies within the Hay-on-Wye settlement boundary, that Hay-on-Wye is identified as a Key Settlement and that Policy KLP2 specifically supports proposals which strengthen and enhance community facilities serving the town and wider area.

3.1.3 Importantly, the Officer concluded that the proposals, taken as a whole, *"could be considered favourably by the Authority*", recognising that they would further develop the community facilities already established on the site and that the policy position supports the principle of such development.

3.1.4 The Authority also raised no objection to the broad layout presented at pre-application stage. It was specifically noted that the layout appeared to take account of neighbouring properties and provided sufficient separation from residential properties to avoid overlooking. Proposed tree planting was also welcomed, albeit with the suggestion that this could be increased as the scheme developed.

3.1.5 Overall, the pre-application process established that there was no objection to the principle or broad layout of the development. Rather, the Authority identified a series of detailed matters which would need to be evidenced and resolved through the preparation of a formal application.

3.2 Responding to the advice

3.2.1 The proposals have subsequently been developed in response to the matters raised through the pre-application process. In particular, the application is accompanied by a Landscape and Visual Impact Appraisal, together with a detailed landscaping scheme. This responds directly to

the Authority's request for the landscape effects of the development to be properly assessed and for additional planting to be considered.

3.2.2 The Authority identified ecology, trees, biodiversity and green infrastructure as matters requiring further assessment. It requested an ecological assessment, appropriate biodiversity enhancement and a Green Infrastructure Statement. The application is supported by detailed surveys and reports which both informed the design of the proposals and reports on the likely effects.

3.2.3 Drainage and highways were also identified as matters to be addressed at application stage. The Authority advised that details of the proposed surface water drainage arrangements should accompany any application and that the acceptability of the access and traffic effects would need to be demonstrated. These matters have subsequently informed the detailed development of the scheme and are addressed through Drainage Strategy and Transport Statement accompanying the application.

3.2.4 A separate issue associated with the swimming pool was foul drainage. Given the potential volume of wastewater generated, the Authority recommended early discussions with Dŵr Cymru Welsh Water to establish whether the sewerage network has sufficient capacity. More generally, the Authority requested details of the proposed foul drainage arrangements and the feasibility of connection to Hay-on-Wye Wastewater Treatment Works. Capacity is confirmed in the accompanying Drainage Strategy whilst a suggested point of connection to the sewer is also included.

3.2.5 The letter also considered the need for the proposed swimming pool. The Authority requested clarification on existing swimming provision within Hay-on-Wye and whether the proposal would replace or affect that existing facility, mainly to demonstrate compliance with Policy 50. This clarification has been provided insofar as the existing swimming pool exists on a “to hire” basis as opposed to being generally open to the public whilst the swimming pool in the proposed development would be generally open to the public.

3.2.6 In respect of the proposed business units, the Authority advised that it could “broadly accept” the provision of ten units for local start-up businesses under Policy 35. It did, however, request evidence demonstrating that there were no suitable existing premises within the settlement capable of meeting the identified requirement, together with justification for the scale of the development and confirmation that it could be satisfactorily served by the highway network.

3.2.7 Highway capacity is confirmed in the accompanying Transport Statement. In respect of the need for the business units, this statement confirms that there has been a significant expression of interest in the proposed units, which provide for an underserved part of the market i.e. smaller companies and startups.

3.2.8 The pre-application advice also identified the Public Right of Way crossing the wider site. The Rights of Way Officer recognised that an informal route is already used and considered that redevelopment presented an opportunity to establish a permanent route as part of the development. The proposals have been designed with both the formal and informal route of the footpath in mind. Both routes would be capable of use following the development.

3.3 Supporting documents required

3.3.1 The pre-application advice issued included two helpful lists of required documentation to support a planning application. The first specified the documents required to enable the application to be validated. The second specified documents recommended to enable a favourable recommendation.

Documents required for successful validation

- Site Location Plan to a scale of 1:1250 or 1:2500;
- Existing and Proposed Site Layout Plan to a scale of 1:200 or 1: 500;
- Existing and Proposed Elevations to a scale of 1:100 or 1:50;
- Existing and Proposed Floor Plans including Roof Plans to a scale of 1:100 or 1:50;
- Existing and Proposed Site Sections to a scale of 1:200 or 1: 500;
- Appropriate planning application fee
- Pre-Application Consultation Report due to site being over 1ha.
- Environmental Statement *if required*

3.3.2 The plans required have been produced by CO2 architects. The application form will be completed and the fee paid too. The Pre-Application Consultation Report will be produced following the completion of the PAC process.

3.3.3 The development is not, in our view, EIA development whereby an Environmental Statement is not required.

Documents recommended to enable a positive recommendation

- Ecological information – ecological assessment including any necessary surveys and details
- Landscaping details (utilising native species as listed in Appendix 5 of the LDP including the proposed biodiversity enhancements for the scheme)
- Green Infrastructure Statement
- Landscape Visual Impact Appraisal
- Construction Environmental Management Plan (CEMP) subject to the outcome of appropriate surveys
- Transport Statement/Assessment
- Details of any external lighting
- Tree Survey and Tree Protection Plan
- A Design and Planning Statement. This should explain the process taken to the design of the proposed development, how the proposal is appropriate to its context and the National Park and how it meets the various LDP policies.
- Details of access and parking.
- Drainage Strategy and details of surface water and foul water treatment including percolation testing (where appropriate) and biodiversity enhancements. Consideration will need to be given to phosphate impact.

3.3.4 All of the above have been carried out by the design team. Additionally, the scheme is accompanied by Bat Surveys, a Sustainability Statement, and Travel Plan have been produced to demonstrate that the schemes comply with relevant policies.

3.4 Community consultation

3.4.1 Extensive community consultation has also been carried out, as explained in detail in the accompanying Pre-Application Consultation Report.

3.4.2 In summary, three community consultation events were held at various stages in the process. Early engagement helped to frame the proposals.

3.4.3 A dedicated website was also maintained throughout the process, providing updates on the progression of the proposals and inviting comments and feedback from the local community.

3.4.4 The statutory Pre-Application Consultation in accordance with the *Planning (Wales) Act 2015* is to be carried out via a dedicated website and a community consultation event to be held at Hay on Wye Library on 24th and 25th November 2026. The consultation and associated material will be publicised through site notices displayed around the site whilst nearby residents will be notified directly.

3.4.5 Statutory consultees will also notified directly and invited to comment on the proposals. These include:

- Bannau Brycheiniog National Park Authority;
- Powys County Council
- Herefordshire Council
- The Environment Agency
- Natural Resources Wales
- Dŵr Cymru Welsh Water
- Hay-on-Wye Town Council

4. The Proposals

4.1 Overview

4.1.1 The application seeks full planning permission for the comprehensive redevelopment and enhancement of the existing Hay-on-Wye Sports Fields to create a new community campus, incorporating community, leisure, recreational and employment facilities.

4.1.2 The development is being promoted by Hay and District Sports and Community Association Limited (HADSCAL) Ltd and seeks to establish a high-quality, multi-functional campus which will serve Hay-on-Wye and the wider rural hinterland. The proposals will substantially enhance the range of facilities available to the local community They will provide opportunities for recreation, health and wellbeing, social interaction, education and employment.

4.1.3 The principal elements of the proposed development comprise:

- Community Building: A new two-storey community building providing accommodation for Hay Youth Club and Hay Dial-a-Ride, together with flexible meeting rooms, activity spaces and other accommodation available for community groups, events and wider public use.

- Swimming Pool and Fitness Facilities: A new indoor/outdoor swimming pool and associated fitness facilities, providing opportunities for swimming, exercise, recreation and health and wellbeing. The facilities will be available for community use and will substantially improve local access to indoor leisure provision.

- Multi-Use Games Area (MUGA): An outdoor all-weather sports facility capable of accommodating a range of sporting and more recreational activities, providing opportunities for organised and informal exercise.

- Community Growing Spaces: Dedicated areas for community growing, enabling residents to grow produce, develop practical skills and participate in outdoor activities in a shared and sociable environment.

- Business Units: The construction of ten small business units, providing approximately 1,015 sqm of flexible employment accommodation. The units will support local businesses whilst generating rental income to contribute to the financial sustainability of the community campus.

- **Access, Parking and Infrastructure:** New vehicular and pedestrian access, parking, cycle facilities, electric vehicle charging provision, surface water drainage and other supporting infrastructure.

- **Landscaping and Biodiversity Enhancements:** A comprehensive landscaping scheme incorporating new planting, green infrastructure and biodiversity enhancements.

4.1.4 Importantly, the various elements of the development are intended to operate as a cohesive community campus rather than as a collection of independent facilities. The community, leisure and recreational uses will complement one another, encouraging shared use of the site by different groups and organisations throughout the day and evening.

4.1.5 The proposals have been designed with sustainability as a main consideration. The buildings will incorporate energy-efficient design principles and renewable energy technologies, whilst the wider development will include sustainable drainage infrastructure and measures to encourage active travel and reduce reliance upon private vehicles.

4.2 Environmental Objectives and Impacts

4.2.1 The proposals have also been conceived in response to the sensitive environmental and landscape context of the site. The land lies within Bannau Brycheiniog National Park, near to Hay-on-Wye Conservation Area and the River Wye Special Area of Conservation. The environmental performance of the development has consequently been an important consideration throughout its evolution.

4.2.2 HADSCAL's ambition is to bring the operational carbon impact of the campus as close to neutral as practicable. The sustainability of the development is considered in the accompanying **Sustainability Statement**.

4.2.3 The principles of the Living Building Challenge, which is an international sustainable building certification program, have helped to inform the approach to energy, water, and materials.

4.2.4 The buildings would be constructed using sustainable, responsibly sourced and low-impact materials wherever practicable, with opportunities for the use of local materials and suppliers considered as part of the detailed design.

4.2.5 Renewable energy would be generated through roof-mounted solar panels on the building

whilst heating and hot water would be provided using ground source heat pumps rather than relying on fossil fuel-based systems. Solar generation would also be incorporated into the proposed EV charging canopy within the car park.

4.2.6 The sustainable approach to energy usage and generation has the benefit of reducing effects on the environment whilst also making the development more resilient to the effects of climate change and possible energy shortages.

4.2.7 The location also provides opportunities for journeys other than by private car as explored in the in the Transport Statement. The site is within walking distance of the centre of Hay and surrounding residential areas, whilst cycle parking would be provided as part of the development.

4.2.8 On-site parking, including electric vehicle charging, would accommodate those who need to travel by car and help avoid unnecessary parking pressure on surrounding streets.

4.2.9 The application is also accompanied by a Drainage Strategy which confirms that surface water would be managed through a comprehensive Sustainable Drainage System. This incorporates a range of shallow and integrated drainage features, including a pond and permeable paving, which discharges water to the existing ditch at a controlled rate. Again, the approach to drainage has been a fundamental part of the site design rather than being treated as an engineering add-on.

4.2.10 The proposals have been developed with particular regard to the site's location within Bannau Brycheiniog National Park and its relationship with Hay-on-Wye and the rising landscape to the south. The Landscape Statement considers these effects in detail and has informed the siting, scale and landscape treatment of the development.

4.2.11 Existing trees and hedgerows provide an established landscape framework. The Tree Survey and Arboricultural Impact Assessment identifies 23 individual trees, four groups and three hedgerows within and adjoining the site. Existing vegetation would be retained wherever practicable and supplemented by substantial new tree, hedgerow and other planting, particularly towards the southern boundary.

4.2.12 The Green Infrastructure Statement brings these measures together, incorporating retained vegetation, new planting, open space, SuDS and habitat areas as part of a coordinated green

infrastructure network. This would help assimilate the development into its setting and strengthen the landscape structure of the site.

4.2.13 The ecological implications of the development have been considered through the accompanying **Ecology Survey**, including **Bat Surveys**. This has informed the design and identified appropriate mitigation and enhancement measures.

4.2.14 Existing habitats would be retained wherever practicable, with new planting, habitat creation and biodiversity enhancements incorporated throughout the site. These measures, together with the wider proposals set out in the Green Infrastructure Statement, would enhance the ecological value and connectivity of the site whilst integrating the development with its wider physical and ecological setting.

4.2.15 A **Lighting Design** has been prepared to ensure that site lighting would be carefully controlled in recognition of the National Park's valued dark skies. External lighting would be limited to that necessary for the safe and effective operation of the campus and designed to minimise unnecessary light spill.

5. The Community Benefits of the Development

5.1 Purpose of the Development

5.1.1 The proposals seek to deliver the 'Hay Community Campus' which is a new community, recreation, sporting and employment hub serving Hay-on-Wye and the surrounding area. The project is being promoted by the Hay and District Sports & Community Association Ltd (HADSCAL), a charitable company which has owned and managed the site since 1994.

5.1.2 HADSCAL was established to provide and maintain leisure, sporting and community facilities; encourage the formation and development of clubs and associations using those facilities; and support sporting and community activities within Hay and the surrounding district. It is run by local volunteer directors with any income generated by the organisation reinvested in pursuing its charitable objectives.

5.1.3 The proposals represent the latest stage in a long-standing ambition to improve community facilities within Hay. HADSCAL has supported sport and community activity from the site for more than 30 years. Planning permission was previously granted in 2009 for a school, community hall and youth centre, although that scheme did not ultimately proceed. More recently, engagement with local clubs, organisations, Powys County Council and the wider community confirmed that the underlying need for improved facilities remains.

5.1.4 The proposals have therefore been developed as a comprehensive campus rather than a series of unrelated uses. Community, sporting, recreational, growing and employment uses would be brought together on one accessible site close to the town.

5.1.5 Importantly, the associated commercial elements of the scheme are intended to provide an income stream which helps sustain the community facilities over the long term.

5.2 Community Building

5.2.1 At the heart of the campus would be a new two-storey community building. This would provide permanent, purpose-designed accommodation for Hay Youth Club and Dial-a-Ride, both of which provide important services within the local community but have lacked the certainty of a permanent purpose-built home. Discussions are also taking place with other local organisations interested in using space within the campus.

5.2.2 The building would, however, serve a considerably wider purpose. Flexible rooms of different sizes would be available for meetings, events, workshops, performances and other community activities, to be hired by groups as and when required.

5.2.3 The proposal is therefore to create a building which can respond to a wide range of community needs rather than being dedicated to a single organisation or activity. This flexibility is important to the long-term usefulness of the facility, allowing the building to adapt as the needs of Hay and its surrounding communities change.

5.3 Sport and Recreation

5.3.1 A significant part of the proposals is directed towards improving opportunities for sport, exercise and physical activity. The campus would provide a swimming pool, gym and multi-use sporting facilities, substantially broadening the range of activities which can take place within Hay throughout the year.

5.3.2 An all-weather Multi-Use Games Area would provide space capable of accommodating a range of sports throughout the seasons.

5.3.3 The existing sporting role of the site would also continue. Hay St Mary's Football Club would retain its main football pitch under its existing 25-year lease and would continue to operate independently from the site. The Club separately benefits from planning permission for new facilities, although this proposal includes new changing facilities for the football club.

5.3.4 Taken together, the proposals would considerably extend and broaden the sporting offer available locally. Importantly, the intention is not simply to provide facilities for established sports clubs, but to create opportunities for informal exercise and recreation which can be accessed by people of different ages, interests and abilities.

5.4 The Swimming Pool

5.4.1 The Council's pre-application response raised the potential for the proposed swimming pool to compete with the existing Hay-on-Wye Swimming Pool. This has been considered in developing the proposals.

5.4.2 The two facilities would, however, perform different functions. The existing pool operates principally as a privately booked facility, accommodating swimming lessons, group sessions and

other organised activities arranged in advance. Whilst anyone can make a booking, it does not operate as a conventional community leisure pool which individuals can attend for general swimming during advertised opening hours.

5.4.3 The proposed pool would address this different need. It would form part of the wider community campus and be available for general use by individuals and members of the community, alongside use by clubs, groups and organised activities. It would therefore provide opportunities for casual and recreational swimming which are not presently available locally in the same way.

5.4.4 Importantly, the owners of the existing swimming pool have been engaged as part of the development of the proposals and are supportive of the provision of a new pool providing wider public access.

5.5 Community Growing

5.5.1 The Campus would also incorporate an expanded community growing space. A smaller-scale growing project has already been established on the site and has demonstrated the potential for this use.

5.5.2 The proposals would allow the initiative to develop, with additional growing areas available to individuals, families and community groups. This would provide opportunities for local food production.

5.5.3 However, the value of the growing space extends beyond food production. Gardening and communal growing provide opportunities for physical activity, social interaction and spending time outdoors. The facility would therefore complement the more formal sporting and community elements of the campus, providing a different and more informal means by which residents can participate in community life.

5.5.4 The growing areas would be designed to be inclusive and accessible, allowing participation by experienced growers and those with little or no previous experience.

5.6 Employment and Financial Sustainability

5.6.1 Ten business start-up units are proposed on the eastern side of the site, along Forest Road. These would provide affordable and energy-efficient workspace for local businesses and new

enterprises, responding to the limited availability of suitable small business accommodation within the area.

5.6.2 The units are also integral to the financial model underpinning the wider campus. Rental income generated from the business accommodation would contribute towards the ongoing costs of operating and maintaining the community facilities.

5.6.3 This is an important component of the proposals. Rather than creating community facilities which are dependent on grant funding or public subsidy, the development seeks to establish a long-term and resilient income stream alongside them. The employment and community elements are therefore mutually supportive. The business units provide useful local employment space whilst also helping to secure the continued operation of the community facilities.

5.6.4 Initial capital funding includes a substantial grant from Powys County Council, with further funding opportunities being pursued alongside the planning process.

5.7 Accessibility and Inclusion

5.7.1 The fundamental aim of the project is to create a campus which can be used by the whole community. Accessibility has therefore informed the concept from the outset rather than being treated solely as a matter of detailed building design.

5.7.2 Buildings, paths, landscaping and outdoor spaces would be designed to allow convenient movement throughout the campus for people of different ages and abilities, including those with mobility requirements. Quiet seating and less formal spaces would complement the more active sporting areas, recognising that the campus should provide opportunities for social interaction and community participation as well as organised sport.

5.7.3 This approach is particularly important given the range of activities proposed. The intention is to create a place which can be used by children and young people, families, older residents, sports clubs, community organisations, businesses and anyone who simply wishes to use the outdoor spaces.

5.8 Overall Role of the Development

5.8.1 The development is ultimately intended to provide considerably more than a collection of new

buildings. It would consolidate and expand a community role which HADSCAL and the site have performed for more than three decades.

5.8.2 The campus would provide permanent accommodation for established community organisations; new facilities for sport and exercise; flexible space for meetings, events and community activities; opportunities for communal food growing; and affordable workspace for local businesses and start-ups. The employment accommodation would, in turn, help generate the income required to maintain the community facilities over the long term.

5.8.3 The project has also been shaped through extensive engagement with the community. Consultation undertaken since 2024 has confirmed continued demand for improved community facilities and has informed the evolution of the proposals. That engagement has continued through the design process, including formal Pre-Application Consultation.

5.8.4 The result is a mixed-use campus designed around the needs of Hay and its surrounding communities. It seeks to:

- Improve access to sport and recreation;
- Provide secure local accommodation for important local organisations;
- Create opportunities for social interaction and community participation;
- Support local enterprise; and
- Establish a financial model to secure the long term sustainable future of the Campus.

6. The Economic Benefits of the Development and Need for Business Units

6.1 Economic benefits of the leisure and community building

6.1.1 The community and leisure facilities would generate direct employment associated with the swimming pool, gym, sports facilities and operation of the wider campus. The HCA Employment Density Guide identifies a benchmark of approximately 65 sqm GIA per FTE for sports centres and private clubs, providing an indication of the employment that could be supported. However, the guide goes on to recognise that sports halls and indoor arenas typically require substantial floorspace relative to their staffing requirements, with employment densities potentially exceeding 100 sqm per full-time equivalent (FTE) employee.

6.1.2 Furthermore, much of the proposed sports hall accommodation will be used by clubs, coaches and community groups, rather than requiring a permanent staffing presence.

6.1.3 Therefore, taking account of the proposed mix of uses, the operational needs of the facilities and the anticipated staffing requirements, a figure of 100 sqm per FTE employee is a realistic estimate.

6.1.4 The proposals are for 3,358 sqm floor space (GIA) whereby the development is expected to create around 33 FTE jobs.

6.1.5 The facilities would also help retain expenditure within Hay. Residents currently travelling elsewhere to access swimming, gym and other leisure facilities inevitably spend money outside the area. Providing these facilities locally would retain a greater proportion of that expenditure and generate additional activity within the town with the carrying out of linked trips.

6.1.6 The wider economic and social value of investment in sport is well established. Sport Wales' *Social Return on Investment of Sport in Wales* found that sport and active recreation generated approximately £5.98 billion of social value in Wales in 2021/22, equivalent to £4.44 for every £1 invested. This included benefits created by improved health and wellbeing, social capital and volunteering.

6.1.7 In the same study, Sport Wales also estimated that sport directly supports approximately 38,345 FTE jobs and contributes around £1.9 billion GVA to the Welsh economy, with further benefits generated through the wider supply chain.

6.1.8 These national figures cannot readily be directly attributed to the development but demonstrate the wider benefits associated with investment in accessible sport and leisure facilities. The proposals would contribute towards those benefits by increasing opportunities for sport, recreation and community activity within Hay and the surrounding area.

6.1.9 The development would therefore create direct employment whilst generating wider economic, health and social benefits for Hay and the surrounding area.

6.2 Need for the business units

6.2.1 The ten business units would provide small, affordable and energy-efficient workspace for local businesses and start-up enterprises. They respond to an identified need for suitable small-scale employment accommodation within Hay, providing opportunities for businesses to establish and grow locally.

6.2.2 There has already been significant interest expressed in the proposed units by local businesses, demonstrating a clear demand for this type of accommodation. The units would provide a different offering to more traditional, larger commercial and industrial premises, catering for smaller businesses which do not require larger employment accommodation. In this respect, the proposals would address a particular segment of the local employment market which is not necessarily well served by existing commercial premises.

6.2.3 The provision of these units would support the local economy by encouraging entrepreneurship, creating employment opportunities and helping to retain businesses within the town.

6.3 Economic benefits of the B1 Units

6.3.1 The proposals include ten flexible business units providing approximately 1,015 sqm GIA of new employment floorspace. These would provide affordable accommodation for small businesses and start-up enterprises, allowing businesses to establish and grow within Hay.

6.3.2 The Homes and Communities Agency *Employment Density Guide* identifies employment densities of approximately 30–60 sqm per FTE for incubator workspace. Allowing for the difference between gross and net floorspace, the proposed units could reasonably support approximately between 17 and 34 FTE jobs, with potential for greater employment where occupied by more employment-intensive businesses such as office space.

6.3.3 The benefits extend beyond direct job creation too. The units would help retain and grow businesses within Hay, provide opportunities to work locally and increase the supply of modern small-scale employment premises.

6.3.4 Importantly, rental income from the units would also support the operation and maintenance of the community and sporting facilities. They would therefore generate direct economic benefits whilst helping to secure the long-term financial sustainability of the wider campus.

7. Planning Policy and the Principle of Development

7.1 The Planning and Compulsory Purchase Act 2004

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

7.1.2 In this case, the statutory Development Plan for the area comprises the **Bannau Brycheiniog National Park Local Development Plan** ('LDP') and **Future Wales**. We discuss relevant policies throughout the statement.

7.1.3 **Planning Policy Wales – Edition 12** ('PPW 12') and the suite of **Technical Advice Notes** ('TAN') are national policy and are important material considerations for all planning applications in Wales.

7.2 Future Wales: The National Plan 2040

7.2.1 Future Wales was adopted by the Welsh Government in February 2021 and forms part of the statutory Development Plan here. It establishes the national spatial strategy for development through to 2040 and addresses key priorities including economic prosperity, climate change, environmental resilience and the health and wellbeing of communities.

7.2.2 Future Wales promotes sustainable development which responds to the needs of existing and future generations, recognising the importance of creating healthy, connected and resilient communities. It seeks to ensure that development supports economic opportunities, improves access to services and facilities, encourages sustainable travel and contributes towards decarbonisation.

7.2.3 Of particular relevance to the proposed development are Policies 4 and 5, which support rural communities and the rural economy. These policies recognise the importance of sustaining vibrant rural settlements through appropriate development, improved access to services, employment opportunities and investment in local infrastructure. They acknowledge the particular challenges faced by rural communities, including access to facilities and economic opportunities.

7.2.4 Importantly, Future Wales makes specific reference to Hay-on-Wye within its consideration of

the Mid Wales region, recognising the strong links between Brecon, Hay-on-Wye, Talgarth and Crickhowell. The town forms part of the wider Brecon and the Border area, which is identified as a Regional Growth Area under Policy 25. This recognises the importance of the wider network of settlements in supporting the social and economic wellbeing of the region.

7.2.5 Policy 9 relates to resilient ecological networks and green infrastructure. It seeks to ensure that development maintains and enhances biodiversity, improves ecosystem resilience and incorporates green infrastructure as an integral component of sustainable placemaking.

7.2.6 The proposed development is consistent with these overarching objectives. The creation of a comprehensive community campus within Hay-on-Wye will significantly enhance the range and quality of community, recreational and leisure facilities available to residents of the town and its wider rural hinterland. In doing so, the development will strengthen Hay-on-Wye's role in serving the surrounding rural community, improving access to facilities and reducing the need to travel further afield.

7.2.7 The development will also promote healthier lifestyles, social interaction and community cohesion, whilst the proposed business units will provide opportunities for local employment and support the long-term financial sustainability of the campus.

7.2.8 Furthermore, the development has been designed with sustainability as a central consideration, incorporating energy-efficient buildings, renewable energy technologies, sustainable drainage and green infrastructure. Its location within the Hay-on-Wye will also enable the facilities to be accessed by sustainable modes of transport.

7.2.9 In summary, the proposed development will make a positive contribution towards the strategic objectives of Future Wales by strengthening community infrastructure, supporting the rural economy, promoting health and wellbeing and delivering a high-quality, sustainable development. It is therefore considered to accord with the overarching aims of Future Wales, including those relating to the sustainable development of the Mid Wales region.

7.3 The Local Development Plan

7.3.1 The LDP is intended to meet the needs of the National Park for housing, employment and services whilst protecting its high-quality environment. It should be read as a whole, but the policies discussed below are of particular relevance to the principle of the development.

7.3.2 Policy SP1 – National Park Policy is at the heart of the LDP and requires that proposals comply with the statutory purposes and duty of the National Park. It provides support where development conserves and enhances the natural beauty, wildlife and cultural heritage of the park, where it supports understanding and enjoyment of the special qualities of the park, and where it assists the economic and social wellbeing of local communities.

7.3.3 The National Park is not simply an environmental designation. Rather, the LDP describes it as a "living working landscape" and expressly envisages sustainable development which benefits the environment, economy and local communities.

7.3.4 Policy 1 – Appropriate Development in the National Park provides the detailed framework against which development is assessed. It requires that development is of a scale, form, design, layout, density and intensity appropriate to its surroundings and that it is satisfactorily integrated into the landscape. The policy also requires that proposals avoid unacceptable effects upon the vitality and identity of communities and provides opportunities for biodiversity enhancement.

7.3.5 The relevant question is therefore whether development is appropriately located and designed and whether it can take place without unacceptable harm to the qualities for which the National Park is designated.

7.3.6 Hay-on-Wye is identified as a 'Key Settlement' in the LDP. The settlement strategy seeks to direct development towards such locations which are close to services and facilities whereby the need to travel is reduced. This approach is reflected in Strategic Objective SQ2.

7.3.7 The application site lies within the defined settlement boundary for Hay-on-Wye. That is important as the LDP explains that settlement boundaries are the mechanism used to identify the capacity of settlements to accommodate development.

7.3.8 Policy K LP2 – Key Settlement Appropriate Development is the main spatial policy applicable to the proposals. Most notably for this application is that the policy expressly supports development which strengthens and enhances the provision of community facilities serving the town and wider area.

7.3.9 The proposals are entirely consistent with that objective in that they would expand and improve an established community and sporting facility within the defined settlement, rather than

introduce development into an isolated countryside location.

7.3.10 Strategic **Policy SP15 – Supporting Sustainable Communities** and **Policies 50** and **51** provide the main policy framework for community, sporting and recreational development. SP15 promotes integrated communities with access to a wide range of facilities and services and promotes opportunities for healthy lifestyles and wellbeing in sustainable locations.

7.3.11 **Policy 50 – Retention of Existing Community Facilities** seeks to protect community facilities but expressly recognises that redevelopment can be appropriate where existing facilities can best be retained or enhanced through redevelopment. The are closely related to and assist the retention of existing facilities.

7.3.12 **Policy 51 – Development of New or Extended Community Facilities** is probably the policy most relevant to the proposals. It provides direct support for new and extended community facilities within defined Settlement Boundaries, subject to the development being necessary to support community sustainability, being operationally sustainable and avoiding unacceptable effects upon neighbouring amenity.

7.3.13 The proposal represents a large investment in the HADSCAL site which would significantly expand and improve the range and quality of community, sporting and recreational facilities available. The proposals would deliver significant community benefits.

7.3.14 The proposed community building, multi-use sporting facilities, community growing space and associated facilities are precisely the sort of development sought by Policy 51. The location within the Hay-on-Wye Settlement Boundary provides clear policy support for the principle of those elements of the scheme.

7.3.15 The development would also have significant economic impacts. **Policy SP12 – Economic Wellbeing** and **Policy 35 – Employment Generating Development** are most relevant.

7.3.16 The LDP identifies the provision of a sustainable economy, with strong links between employment opportunities and housing, as one of its strategic objectives. The wider vision of the LDP similarly seeks a prosperous and vibrant National Park whilst ensuring that environmental impacts remain within acceptable limits.

7.3.17 **Policy SP12** supports development which improves the economic and social wellbeing of National Park communities to minimise the need to travel. In particular, it supports

employment opportunities within Primary and Key Settlements where they are appropriate to the form and character of the settlement and its landscape setting.

7.3.18 The proposals respond positively to these policy objectives. The development would significantly enhance the range of community, sporting and leisure facilities available within Hay-on-Wye, whilst also providing new business units. This would allow more residents to access employment, leisure and community facilities locally, limiting the need for outward travel and supporting the LDP objective of locating development close to existing communities, services and facilities.

7.3.19 The proposals would generate employment in several ways. Firstly, in a traditional manner through the proposed business units and secondly through the operation and management of the new leisure, sporting and community facilities. The development would therefore strengthen both the social and economic role of Hay-on-Wye, in accordance with Policy SP12.

7.3.20 Policy 35 – Employment Generating Development provides a more detailed development management policy. It expressly supports B Class employment development in identified locations, including within or adjacent to settlements where the relevant requirements of the policy are met. Matters to be considered include the availability of alternative employment sites, the scale of development, effects upon amenity, access and highway capacity and effects upon the natural beauty, wildlife, cultural heritage and environmental resources of the National Park.

7.3.21 The proposed business units are within the defined Hay-on-Wye Settlement Boundary and would sit alongside an established concentration of commercial and employment development on Forest Road. They are also very well connected to the wider town and to residential development therein. The principle of their delivery is therefore entirely consistent with the LDP's objective of supporting employment and economic wellbeing within the Key Settlements.

7.3.22 In respect of the detailed requirements, the accompanying Transport Assessment confirms that the proposed business units can be safely accessed and accommodated without unacceptable effects upon highway safety. Furthermore, the units would be situated alongside established commercial uses and would not give rise to unacceptable effects upon neighbouring amenity.

7.3.23 The environmental effects of the development are confirmed as being acceptable in the accompanying surveys and reports. Whilst some localised landscape and visual effects are

acknowledged, the proposals would not materially affect the wider landscape character or special qualities of the National Park.

7.3.24 In terms of the availability of alternatives, the units respond to an identified demand for small, affordable business accommodation, particularly for start-ups and smaller enterprises. Significant interest has already been expressed in the units, reflecting the limited availability of suitable alternative accommodation within Hay-on-Wye. It is also relevant that the units are a central element of the wider application scheme. Their delivery is essentially to the success of the model and therefore the wider leisure and community development.

7.3.25 Accordingly, the proposals comply with the relevant requirements of LDP Policy 35.

7.4 Planning Policy Wales – Edition 12

7.4.1 PPW 12 provides the planning policy framework for Wales. It promotes placemaking and requires planning decisions to consider the social, economic, environmental and cultural dimensions of development in a connected manner.

7.4.2 Of particular relevance to this application is that paragraph 3.50 seeks a broad balance between housing, community facilities, services and employment opportunities. It also requires employment, leisure, recreation and community facilities, to be located within existing urban areas or locations accessible by sustainable modes.

7.4.3 In effect, PPW 12 seeks to concentrate the delivery of community, leisure and employment development within established settlements.

7.4.4 The application is within Hay-on-Wye, close to the existing population and adjoining established sporting, community, healthcare and employment uses. It is entirely consistent with the overarching objective of PPW 12.

7.4.5 PPW 12 also provides specific support for community facilities. Paragraph 4.4.2 encourages planning authorities to take a strategic and long-term approach to the provision of such development and to work with communities to identify land and buildings capable of creating community benefits.

7.4.6 PPW 12 also requires at Paragraph 6.3.6 that great weight is given to the statutory purposes of National Parks. Importantly, however, the policy goes on to explain that National Park

Authorities should seek to foster the social, economic and cultural wellbeing of their local communities. The relevant approach therefore is to secure development which meets local needs whilst conserving the qualities which justify the National Park designation.

7.5 Technical Advice Note 16 – Sport, Recreation and Open Space

7.5.1 TAN 16 is particularly relevant given that significant new sporting and recreational provision is the main part of the proposals. It provides detailed national guidance on the role of the planning system in the provision and protection of sporting, recreational and open-space facilities. Its scope expressly includes outdoor sports facilities, play areas and community growing spaces.

7.5.2 The proposals respond positively to those objectives. The development would retain existing provision on the wider holding whilst introducing a significantly wider range and greater number of facilities, including the MUGA, community growing space, swimming pool, and general leisure facilities.

7.5.3 The proposals would therefore enable a much greater range and number of people to participate in sport, recreation and community activities locally and in a sustainable manner. The proposals are therefore consistent with the objectives of TAN 16.

7.6 Technical Advice Note 23 – Economic Development

7.6.1 TAN 23 is also relevant to the proposed development, both in terms of the proposed business units and the community and leisure development which also creates economic benefits. The purpose of the document is to guide the generation of wealth, employment and income through planning.

7.6.2 TAN 23 advocates a sequential approach to development giving first preference to locations within settlements, followed by edge-of-settlement sites and then the open countryside.

7.6.3 The application site occupies the first of those locations being within the defined settlement of Hay-on-Wye. The location is therefore consistent with the spatial approach advocated by TAN 23.

7.7 Section summary

7.7.1 There is a clear policy basis for the principle of the development.

7.7.2 The site is within the defined settlement boundary of Hay-on-Wye, which is identified as a Key Settlement and is therefore one of the locations towards which the LDP directs sustainable development. Policies K LP2, SP15, 50 and 51 provide the principal support for the delivery of community, sporting and recreational elements, whilst SP12 and Policy 35 supports the delivery of units for employment.

7.7.3 The development is also consistent with PPW12, which seeks to provide community, leisure and employment facilities in accessible locations within existing settlements.

7.7.4 The proposal also responds to the detailed advice in TANs 16 and 23 relating to recreational provision and economic development respectively. The proposed development would improve, significantly, the type and amount of leisure, community, and recreational facilities available to residents of Hay-on-Wye, whilst the proposed economic development is on sequentially preferable land within a settlement.

7.7.5 The remaining questions therefore relate to the acceptability of the development's effects on the National Park and other environmental matters. Those matters are considered in the following chapters.

8. Design and Sustainability

8.1 Policy Context

8.1.1 PPW12 places sustainable development and placemaking at the heart of the planning system. Chapter 5 establishes an energy hierarchy which prioritises reducing energy demand, improving energy efficiency and maximising renewable and low-carbon energy generation.

8.1.2 Future Wales reinforces these objectives through Policy 2, which promotes sustainable placemaking, and Policies 17 and 18, which support renewable and low-carbon energy development subject to appropriate environmental considerations.

8.1.3 TAN 12 – Design promotes high-quality, resource-efficient and environmentally sustainable development.

8.1.4 At a local level, LDP Policy SP4 deals with climate change and requires development to mitigate and adapt to climate change and contribute towards carbon neutrality. Policy SP11 relates to Sustainable Design and promotes sustainable construction and renewable energy, whilst Policy SP9 supports appropriately located renewable energy technologies.

8.1.5 These strategic objectives are reinforced by Policies SP1, 1 and K LP2, which seek high-quality development that responds positively to the character and setting of the National Park.

8.2 The Architectural Approach

8.2.1 The proposals represent a very high standard of design, developed specifically in response to the site's character and its location within Bannau Brycheiniog National Park. The approach to design is described in detail in the accompanying Design Statement by CO2 Architects.

8.2.2 In summary, the architecture takes inspiration from the surrounding Black Mountains, with distinctive roof forms, carefully selected materials and green roof elements which would assist in integrating the development into its landscape setting.

8.3 Sustainability in Design

8.3.1 Sustainability has been absolutely fundamental to the design process. The application is supported by a Sustainability, Carbon and Energy Statement, Operational Carbon Summary

Report and Embodied Carbon Summary Report by RedSix. Together, these provide a detailed assessment of the development's environmental performance and demonstrate how carbon reduction has informed the design.

8.3.2 The development follows the energy hierarchy established by PPW12. Energy demand would firstly be reduced through high-performance building fabric, enhanced insulation and airtight construction. The operational energy assessment models wall, floor and roof U-values of 0.15 W/m²K for the leisure and community building and 0.12 W/m²K for the business units, exceeding minimum building regulation standards.

8.3.3 Energy efficiency would be further enhanced through ground-source heat pumps, underfloor heating and mechanical ventilation with heat recovery. The proposals also incorporate approximately 130 kWp of solar photovoltaic generation, comprising 288 panels, which would make a substantial contribution towards meeting the development's electricity requirements.

8.3.4 The accompanying Operational Carbon Summary Report has assessed the development using dynamic thermal modelling in accordance with the principles of CIBSE TM54. Importantly, the assessment demonstrates that predicted operational energy consumption would be below the relevant CIBSE benchmarks for both the leisure and community building and the business units.

8.3.5 The Embodied Carbon Summary Report also considers the environmental impacts associated with construction, using the RICS Whole Life Carbon Assessment methodology and the UK Green Building Council's Net Zero Carbon Framework. The assessment identifies opportunities to reduce embodied carbon through material selection and construction practices, establishing a pathway towards the applicant's net zero carbon ambitions. Further refinement would take place as the detailed design progresses post planning.

8.3.6 Sustainability extends beyond the buildings themselves. The proposals incorporate sustainable drainage infrastructure, native landscaping, biodiversity enhancements and water-efficient fittings. The site's location within Hay-on-Wye would also enable residents to access community, leisure and employment facilities locally, reducing the need to travel further afield. Pedestrian connections, cycle parking, electric vehicle charging and Travel Plans would further encourage sustainable travel.

8.3.7 Furthermore, the development would be sustainable in social and economic terms. The flexible community accommodation would respond to changing local needs, whilst income generated

by the proposed business units would contribute towards the long-term operation and maintenance of the community facilities.

8.4 Section conclusion

8.4.1 In summary, the proposals would deliver a very high-quality and sustainable development, incorporating significant measures to reduce energy demand, generate renewable energy and minimise carbon emissions. The development would also provide significant social, economic and environmental benefits.

8.4.2 Accordingly, the proposals are considered to accord with the sustainable development objectives of PPW12, Policies 2 and 17 of Future Wales, the relevant guidance within TANs 12, 15 and 18, and LDP Policies SP1, SP4, SP9, SP11, 1 and K LP2. The development's design and sustainability credentials represent important positive considerations in the overall planning balance.

9. The National Park and Landscape

9.1 Policy context

9.1.1 PPW12 recognises the intrinsic value of landscapes and requires their distinctive characteristics and special qualities to be protected and enhanced. Paragraphs 6.3.3 and 6.3.4 emphasise the importance of minimising adverse effects on landscape character.

9.1.2 Particular protection is afforded to National Parks. Paragraph 6.3.6 requires that great weight is given to their statutory purposes, including the conservation and enhancement of natural beauty, wildlife and cultural heritage. However, it also recognises the importance of fostering the social, economic and cultural well-being of local communities.

9.1.3 PPW12 does not preclude development within National Parks but requires careful consideration of its effects on their special qualities.

9.1.4 Locally, LDP Policy SP1 is a strategic policy which seeks to ensure that development conserves and enhances the natural beauty, wildlife and cultural heritage of the National Park and supports the understanding and enjoyment of its special qualities. The location of the development within a nationally designated landscape is therefore an important consideration, and the proposals must be assessed against the statutory purposes of the National Park.

9.1.5 However, the National Park designation does not establish a presumption against all development. Indeed, the Development Plan expressly provides for development within established settlements, including Hay-on-Wye, subject to the protection of the National Park's special qualities. The relevant consideration is therefore whether the effects of the development would be acceptable having regard to the landscape character of the site and its surroundings.

9.1.6 LDP Policy 1 is also relevant. It requires development to be appropriate to its surroundings in terms of scale, form, design, layout and materials, and to be successfully integrated into the landscape through planting and appropriate management. The policy is not a “no harm” policy. Rather, it requires that development responds appropriately to the characteristics of the receiving environment.

9.1.7 Policy K LP2 is similarly important because it specifically addresses development within the

National Park's key settlements, including Hay-on-Wye. The policy requires proposals to contribute positively to their setting and enhance landscape quality without unacceptable consequences for natural beauty, cultural heritage, environmental assets or biodiversity.

9.1.8 Policy K LP3 seeks to ensure that development within Key Settlements, including Hay-on-Wye, appropriately address impacts on the surrounding environment and community. Where necessary, appropriate mitigation, compensation or enhancement measures are required to be secured. The policy also identifies historic landscape significance as a relevant consideration for schemes at Hay-on-Wye.

9.2 Assessment

9.2.1 The starting point in considering the landscape implications of the proposed development is its location within Bannau Brycheiniog National Park, where national and local planning policy affords considerable weight to the conservation and enhancement of natural beauty, landscape character and the special qualities of the designation. However, the policies do not preclude development within the National Park. Rather, they require development to be appropriately located and designed, having regard to the character and sensitivity of the receiving landscape and the need to support the communities which live and work within it.

9.2.2 In this case, the site falls within the defined settlement boundary of Hay-on-Wye, which is identified as a key settlement in the adopted Local Development Plan. The site is also in established community and recreational use. These are important considerations because the LDP recognises the continuing role of settlements within the National Park in accommodating development, subject to appropriate safeguards.

9.2.3 The LVA by MHP Design identifies that the site occupies a transitional position between the built-up area of Hay-on-Wye and the agricultural landscape beyond. Its character is influenced by the adjoining sports grounds, residential development, medical centre, Forest Road and commercial buildings to the east. Whilst the site contributes to the open and recreational setting of Hay-on-Wye, it is neither isolated nor particularly remote or tranquil. Its character is therefore materially different from the more extensive agricultural landscapes which characterise the wider Wye Valley Foothills.

9.2.4 This does not reduce the importance of the National Park designation, but it provides important context for understanding the contribution which the site makes to its natural beauty and

special qualities. The effects of development must be considered in the context of the landscape into which it is being delivered, rather than treating all parts of the National Park as having an identical sensitivity and value. The LVA concludes that the sensitivity of this part of the National Park is moderated by its established recreational use and close relationship with the settlement.

9.2.5 The proposals would of course change the character and appearance of the site. The introduction of new buildings, parking areas and associated infrastructure would reduce its existing openness and introduce a greater intensity of built development. The LVA identifies adverse landscape and visual effects arising from this change, particularly within the site itself and from nearby public rights of way.

9.2.6 The greatest visual effects would be experienced by users of PRoW 023/8/1, which passes through and immediately adjoins the site. The LVA identifies substantial-to-moderate adverse effects for users of the PRoW. Other nearby receptors would also experience changes to their views. It is therefore accepted that the development would result in some permanent adverse effects on local visual amenity.

9.2.7 However, there must be an important distinction between these localised effects and the consequences for the wider landscape character and special qualities of the National Park. The LVA concludes that the development would have a negligible effect on National Landscape Character Area 29 (Wye and Usk Vales), with limited effects on the wider landscape character areas. Medium and long distance views, including those from Hay-on-Wye Castle and surrounding elevated locations, would experience low or negligible effects.

9.2.8 Therefore, whilst the development would introduce new built form into an established recreational area, that built form would be experienced as part of the existing settlement rather than as an isolated encroachment into the surrounding countryside. The relationship between Hay-on-Wye and the wider agricultural landscape would remain legible, and the development would not materially affect the main characteristics of the Wye Valley Foothills or the wider National Park.

9.2.9 The design of the development has also been informed by its landscape context. The main buildings take inspiration from the surrounding Black Mountains, with roof forms intended to reflect the wider ridgelines and materials which reference the natural textures and colours of the landscape. Green roof elements are proposed to reduce the prominence of the buildings,

particularly when viewed from elevated locations to the south. These measures demonstrate that the design has been developed whilst having regard for the character of the National Park.

9.2.10 The layout and landscape strategy similarly respond to the existing characteristics of the site. The development would be concentrated within an established settlement-edge location, with existing boundary vegetation retained and enhanced where possible. New native tree and hedgerow planting would strengthen the existing landscape framework, particularly along the southern boundary, which defines both the settlement boundary and forms the transition between the town and the countryside to the south. This would help contain the development and soften its appearance as planting becomes established.

9.2.11 The landscape strategy provides more than visual screening. The proposals incorporate species-rich grassland, habitat creation and additional green infrastructure, providing opportunities to enhance biodiversity, strengthen ecological connectivity and improve the quality of the immediate landscape. The LVA identifies a minor beneficial effect on site hedgerows and trees. These improvements would contribute positively to the environmental quality of the site and its relationship with the surrounding countryside.

9.2.12 Overall, therefore, the development would therefore bring about both adverse and beneficial changes to the landscape. The loss of openness and the introduction of built form would result in some permanent adverse effects, particularly for those experiencing the site at close range. Conversely, the proposed landscape measures would retain and strengthen existing features, introduce new habitats and establish a more comprehensive landscape setting for the community facilities. These considerations must be assessed together when determining the overall acceptability of the proposals.

9.2.13 It is also relevant that the development would consolidate community, leisure and employment activities within an established settlement, on land already identified for continued recreational use. PPW12 expressly recognises the importance of fostering the social, economic and cultural well-being of communities within National Parks. The proposals would make a substantial contribution towards these objectives through the provision of facilities serving Hay-on-Wye and the surrounding area. Whilst these benefits do not nullify the identified landscape effects, they are relevant to the wider planning judgement required by policy.

9.3 Section summary

9.3.1 In considering the proposals against national and local landscape policies, the central question is whether the identified adverse effects are sufficient to make the development unacceptable, having regard to the character of the receiving landscape and the special qualities of the National Park.

9.3.2 In our view, the LVA provides an evidential basis for concluding that the adverse effects would be predominantly localised. The loss of openness and changes to views within the immediate site context are acknowledged and would remain to some degree following mitigation. However, the development would not result in significant harm to the wider landscape character or setting of the National Park.

9.3.3 Furthermore, the proposals have been designed to respond to their surroundings and would deliver landscape and ecological enhancements which contribute positively to the quality of the site.

9.3.4 Accordingly, whilst the proposals would cause some landscape and visual harm, that harm would be limited in extent and experienced within an established settlement-edge setting. The development would respect the wider landscape context, retain and enhance important landscape features on the site, and would not materially affect the special qualities of the National Park.

9.3.5 In the round, therefore, the proposed development is considered to respond positively to the landscape objectives of PPW12 and the LDP having particularly regard for Policies SP1, 1, K LP2, and K LP3. The acknowledged localised adverse effects must nevertheless be afforded appropriate weight in the overall planning balance, alongside the associated substantial community, recreational, social and economic benefits.

10. Other technical matters

10.1 Ecology

10.1.1 The application is supported by a Preliminary Ecological Appraisal (PEA), Preliminary Roost Assessment (PRA), and Construction Environmental Management Plan (CEMP) by Focus Environmental. A Bat Survey by Aware Ecology is also being carried out.

10.1.2 PPW12, particularly Chapter 6, requires development to protect and enhance biodiversity, applying the step-wise approach and securing a net benefit for biodiversity. This is reinforced by Policy 9 of Future Wales, LDP Policies 1 and 6 and TAN 5: Nature Conservation and Planning.

10.1.3 The PEA identifies that the site comprises predominantly modified grassland, sparsely vegetated land, scattered trees and native hedgerows. The site is also located approximately 450 metres from the River Wye Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI).

10.1.4 Whilst much of the site is of relatively limited ecological value, the assessment identifies potential opportunities for bats, nesting birds, reptiles, small mammals and invertebrates. Further bat activity surveys were recommended and carried out by Aware Ecology.

10.1.5 A lighting strategy has also been prepared, as recommended in the PEA, so that required lighting levels can be determined.

10.1.6 The supporting CEMP establishes measures to protect retained habitats and wildlife during construction, including vegetation protection, pollution prevention, appropriate working practices and ecological supervision. These measures would also safeguard the nearby River Wye from potential construction-related impacts.

10.1.7 The proposals also incorporate biodiversity enhancements through native tree and hedgerow planting, wildflower grassland, habitat creation and sustainable drainage features, as detailed within the accompanying Green Infrastructure Statement and shown on the Landscape Strategy drawing. These measures would improve ecological connectivity and contribute towards achieving a net benefit for biodiversity.

10.1.8 In summary, the supporting ecological assessments demonstrate that the proposals have been informed by appropriate ecological considerations, with measures identified to protect existing

habitats, minimise impacts on protected species and deliver biodiversity enhancements. Subject to implementation of the suggested mitigation measures the proposals are considered to comply with LD Policies 1 and 6, Chapter 6 of PPW12, Policy 9 of Future Wales and the relevant provisions of TAN 5.

10.2 Trees and Green Infrastructure

10.2.1 The application is supported by an Arboricultural Survey and Impact Assessment, Tree Protection Plan and Tree Removal Plan all by Focus Environmental Consultants, along with a Green Infrastructure Statement by MHP Design Ltd.

10.2.2 PPW12 Paragraph 6.2.12, requires development proposals to incorporate green infrastructure and demonstrate how the step-wise approach to biodiversity has been applied. LDP Policy 8 requires that development affecting trees to is supported by a Tree Survey and Protection Plan and that retained trees and their root systems should be adequately protected. Any agreed tree losses must be compensated through appropriate replacement planting using native species.

10.2.3 The supporting surveys and assessments identify existing trees, hedgerows and grassland which contribute to the site's landscape character and ecological connectivity. The Arboricultural Impact Assessment identifies 23 individual trees, four groups and three hedgerows, all classified as Category C.

10.2.4 The proposals have been designed to retain existing green infrastructure wherever practicable, with new development concentrated within part of the site to minimise impacts on established landscape features. However, the removal of six individual trees and parts of two groups, together with limited hedgerow and scrub clearance would be required. Otherwise, retained trees can be protected during construction, as detailed in the Tree Protection Plan.

10.2.5 The proposals incorporate substantial new planting, with approximately 200 new trees indicatively identified, along with native hedgerows, wildflower grassland and shrub planting. The Green Infrastructure Statement also identifies opportunities for new habitats, green roofs and sustainable drainage features, including an attenuation pond with marginal planting.

10.2.6 The proposals would also deliver wider recreational and community benefits through landscaped open spaces, improved pedestrian connections and community growing areas.

10.2.7 In summary, whilst a limited amount of existing vegetation would be lost, the proposals would deliver substantial new planting, habitat creation and improved ecological connectivity. The supporting Green Infrastructure Statement demonstrates how the step-wise approach has informed the development and how a net benefit for biodiversity would be achieved.

10.2.8 Accordingly, the proposals are considered to comply with LDP Policies 1, 6, and 8 , PPW12, Policy 9 of Future Wales and the relevant provisions of TAN 5 and TAN 12.

10.3 Transport and Access

10.3.1 The planning application is supported by a Transport Assessment (TA), Travel Plan (TP) and Framework Travel Plan (FTP), by Rappor Consultants Ltd. These documents assess the accessibility of the site, proposed access arrangements, parking provision and the likely impact of the development on the local highway network.

10.3.2 The TA explains that the site is approximately 550 metres south of Hay-on-Wye town centre and is accessible by a range of transport modes. Existing footways along Forest Road provide connections to the town centre, whilst Public Right of Way 023/8/1 offers an alternative pedestrian route. Forest Road also forms part of National Cycle Network Route 42, and bus services connecting Hereford and Brecon are available approximately 700 metres from the site.

10.3.3 Vehicular access to the leisure and community facilities will be provided via the existing access onto Forest Road. A new junction onto Forest Road will serve the proposed business units. The two areas of the development will be connected for pedestrians, cyclists and emergency vehicles, but not general vehicular traffic.

10.3.4 The TA confirms that the proposed access arrangements can achieve appropriate visibility splays and accommodate the anticipated vehicle movements.

10.3.5 Traffic surveys demonstrate that Forest Road experiences relatively low traffic volumes. The development is forecast to generate a net increase of 47 and 60 two-way vehicle trips during the weekday morning and evening peak hours respectively. The TA concludes that these additional movements can be accommodated without an unacceptable impact on highway safety or the operation of the local road network.

10.3.6 In total there are 185 car parking spaces and 66 cycle parking spaces across the site which are considered to be sufficient for the needs of the development.

10.3.7 The TP and FTP establish measures to encourage sustainable travel, including the promotion of walking, cycling, public transport and car sharing. These will be supported by a Travel Plan Coordinator and ongoing monitoring, with individual workplace travel plans prepared for the business units once their occupiers are known.

10.3.8 It is also relevant that the provision of new leisure, community and employment facilities within walking and cycling distance of Hay-on-Wye will also reduce the need for residents to travel further afield to access equivalent facilities.

10.3.9 In terms of policy compliance, the proposals accord with LDP Policy SP17 which seeks to improve accessibility, reduce reliance on private vehicles and ensure that new development makes appropriate provision for pedestrians and cyclists. The provision of dedicated pedestrian connections, cycle parking and measures to encourage sustainable travel responds positively to these objectives. The submission of a Transport Assessment and Travel Plans also addresses the policy's requirements for major development.

10.3.10 Policy 59 permits development where appropriate access can be achieved and where traffic generation would not result in unacceptable impacts on highway safety, congestion or the environment. The findings of the TA demonstrate that the proposed development can be accommodated without such impacts. Accordingly, the proposals are considered to comply with Policy 59.

10.3.11 Policy 60 supports proposals which improve opportunities for sustainable travel and make walking and cycling safer and more attractive. The proposed pedestrian connections, relationship with National Cycle Network Route 42 and associated cycle parking provision are consistent with the objectives of this policy.

10.3.12 Overall, the three transport documents evidence that the development can be safely accessed, provides appropriate parking, and will not give rise to unacceptable highway impacts. The development therefore accords with Policies SP17, 59 and 60 of the LDP as well as the sustainable transport objectives of PPW 12, particularly the emphasis on reducing the need to travel and prioritising active and sustainable transport.

10.4 Flood Risk and Drainage

10.4.1 The planning application is supported by a Drainage Strategy by K-Ten Consulting Ltd. The

report considers flood risk, surface water management, foul drainage, water quality and the potential implications for the River Wye Special Area of Conservation (SAC).

10.4.2 The site is located outside Flood Zones 2 and 3 and is therefore at low risk of fluvial flooding. However, the strategy recognises the potential for localised surface water flooding and incorporates measures to manage runoff arising from the development.

10.4.3 Infiltration testing has been carried out and which establishes that ground conditions are unsuitable for a strategy relying only on infiltration. Accordingly, a sustainable drainage system (SuDS) is proposed, comprising permeable paving, porous asphalt, landscaped swales and two dry attenuation basins. These features will collect and attenuate surface water before discharging at a controlled rate of 2.6 l/s to an existing drainage ditch to the north of the site.

10.4.4 The drainage strategy has been designed to accommodate rainfall events up to the 1 in 100 year event plus a 40% allowance for climate change. The strategy also incorporates measures to manage exceedance flows and provide appropriate treatment of surface water runoff. The proposed swales and attenuation basins offer opportunities for landscape integration, biodiversity enhancement and amenity benefits.

10.4.5 The approach is consistent with the objectives of LDP Policy 58, which promotes the incorporation of sustainable drainage systems within new development. The proposed attenuation and treatment measures also respond positively to Policies 10 and 11 by seeking to protect water quality and manage surface water sustainably.

10.4.6 Foul drainage is proposed to connect to the existing public combined sewer to the east of the site, subject to agreement with Dŵr Cymru Welsh Water. The receiving Sewage Treatment Works is Hay-on-Wye Sewage Treatment Works which is located in Herefordshire, England, to the north of the town. This is an important distinction in respect of Nutrient Neutrality matters.

10.4.7 Swimming pool backwash water will be managed separately through a holding tank before controlled discharge to the foul drainage network. These arrangements provide a proposed means of foul drainage disposal consistent with the objectives of Policy 56.

10.4.8 The site lies within the River Wye catchment. However, the National Park Authority's December 2024 Nutrient Statement indicates that developments connecting to Hay-on-Wye Wastewater Treatment Works can generally be screened out from requiring phosphorus neutrality

measures.

10.4.9 The detailed surface water drainage design will be subject to separate approval by Powys County Council as the SuDS Approving Body (SAB), in accordance with the Welsh Statutory Standards for Sustainable Drainage Systems.

10.4.10 Overall, the submitted strategy establishes a credible approach to managing surface water and foul drainage associated with the development. Subject to confirmation of the proposed outfall arrangements, foul drainage connection and the necessary technical approvals, the proposals are considered capable of complying with Strategic Policies SP3 and SP16 and Policies 10, 11, 56 and 58 of the adopted LDP as well as PPW12.

11. Summary and Conclusions

11.1 Development summary

11.1.1 This Planning Statement has explained the proposed Hay Community Campus in the context of the relevant provisions of the Development Plan and national planning policy.

11.1.2 The development would provide a comprehensive range of facilities which would significantly improve the opportunities available to the residents of Hay-on-Wye and the surrounding rural communities. These include a publicly accessible swimming pool, gym, multi-use sporting facilities, community growing spaces and flexible accommodation for community activities. Importantly, the proposals would also provide permanent accommodation for established community organisations, including Hay Youth Club and Dial-a-Ride, helping secure their long-term future.

11.1.3 The social benefits would be considerable. The development would improve access to sport, recreation and leisure, promote physical and mental wellbeing, encourage community participation and provide opportunities for people of all ages and abilities. The facilities would also reduce the need for residents to travel to larger settlements to access equivalent services, representing an important benefit for a rural community.

11.1.4 The economic benefits would similarly be substantial. The development is expected to support approximately 33 full-time equivalent jobs associated with the community and leisure facilities, alongside a further 17–34 full-time equivalent jobs within the proposed business units. The ten business units would provide accommodation for smaller local enterprises and start-up businesses, supporting economic activity, investment and employment within Hay-on-Wye.

11.1.5 The business units form an integral part of the wider development. The income generated from rent would contribute to the operation and maintenance of the community facilities, helping establish a financially viable campus capable.

11.1.6 The principle of development is strongly supported by the adopted LDP. The site lies within the defined settlement boundary of Hay-on-Wye, a Key Settlement where sustainable development is encouraged. The proposals would directly support the objectives of Policies K LP2, SP15, 50 and 51 in providing community and recreational facilities, whilst the employment accommodation would respond positively to Policies SP12 and 35.

11.1.7 The development would also deliver a very high standard of design and sustainability. The architecture has been developed to respond to the landscape setting of the National Park, whilst the proposals incorporate high-performing building fabric, ground-source heat pumps, solar photovoltaic generation, sustainable drainage and green infrastructure. Environmental performance was fundamental to the design process.

11.1.8 The Bannau Brycheiniog National Park has been a critical design consideration. The LVA acknowledges some localised adverse effects. However, these would arise within an established edge of settlement context and would be mitigated by proposed landscaping. The development would not harm the wider landscape or special qualities of the National Park.

11.1.9 The application is supported by a comprehensive suite of technical surveys and reports which address highways, transport, ecology, arboriculture, drainage, lighting and sustainability. They demonstrate that the development can be carried out without unacceptable effects on the associated planning matters subject, in some cases, to appropriate mitigation.

11.2 Conclusions

11.2.1 In terms of the overall planning balance, considerable weight should be afforded to the substantial public benefits of the proposals. The development would provide facilities which are important to the health, wellbeing and social cohesion of the community. It would also secure accommodation for community organisations, create employment, support local businesses and deliver a financially viable community asset for future generations. These benefits extend to Hay-on-Wye and its wider rural hinterland.

11.2.2 Whilst there are some localised landscape and visual effects, they have informed the design and mitigation strategy. In our view, they would be substantially outweighed by the considerable and permanent benefits of the development, including go the National Park itself which is a living and working landscape. PPW 12 and the LDP recognise that the social, economic and cultural wellbeing of National Park communities is important.

11.2.3 PPW 12 places sustainable development and placemaking at the heart of the planning system, whilst Future Wales promotes the creation of healthy, prosperous and resilient communities. These objectives are reflected in the LDP, which supports sustainable development that meets the needs of local communities whilst respecting the special qualities of the National Park.

11.2.4 The development would respond directly to those objectives, delivering substantial long term social and economic benefits via a high-quality and sustainable scheme. The identified adverse effects would be limited and would not outweigh those benefits.

11.2.5 Accordingly, the proposals comply with the Development Plan and the overarching sustainable development objectives of PPW12 and Future Wales. Therefore and in accordance with the statutory requirement to determine applications in accordance with the Development Plan unless material considerations indicate otherwise, it is our view that planning permission should be granted.

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