

## LOCAL MEMBER OBJECTION & PETITIONS

COMMITTEE DATE: 16/12/2020

APPLICATION No. **19/02506/MJR** APPLICATION DATE: 05/11/2019

ED: **BUTETOWN**

APP: TYPE: Full Planning Permission

APPLICANT: The Museum of Military Medicine

LOCATION: LAND OFF HARBOUR DRIVE, CARDIFF BAY,  
CARDIFF

PROPOSAL: THE CONSTRUCTION OF A MILITARY MEDICINE MUSEUM ON LAND FORMING PART OF BRITANNIA PARK, HARBOUR DRIVE. THE BUILDING WOULD COMPOSE OF TWO DISTINCT ELEMENTS, A FULL GLAZED FLAT ROOFED BOX TO ITS SOUTH-WESTERN END AND PARTIALLY FRETTED CORTEN SKIN FINISHED BUILDING WITH SAWTOOTH ROOF DESIGN ALONG THE REST OF ITS LENGTH. THE DEVELOPMENT INCLUDES FOR THE DECONSTRUCTION AND RESITING OF LOCK KEEPERS COTTAGE

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**RECOMMENDATION 1** : That planning permission be **GRANTED** subject to the following conditions :

1. C01 - Statutory Time Limit

2. APPROVED PLANS

The Development approved is that indicated on drawing references:

TP	(00)	002	Rev2	Existing Site Plan
TP	(00)	003	Rev4	Site Plan [application boundary]
TP	(11)	100	Rev3	Elevations
TP	(10)	100	Rev4	Ground Floor Plan
TP	(10)	101	Rev4	First Floor Plan
TP	(10)	102	Rev4	Second Floor Plan
TP	(10)	103	Rev4	Third Floor Plan
TP	(10)	104	Rev4	Roof Plan

Reason: For the avoidance of doubt

3. RESTRICTION ON CHANGE OF USE

The building shall only be used for the purposes of a Museum and for no other purpose including any other purpose included within use class D1 of the Town and Country Planning Use Classes Order 1987 or in any

Order revising, amending or superseding that order.

Reason: Other uses within use class D1 may adversely impact on the character and amenities of the area, and have not been considered as part of these proposals in accordance with the aims of policy KP10 of the Adopted Cardiff Local Development Plan 2006-2026.

4. REQUIREMENT FOR PUBLIC REALM ENHANCEMENT

Prior to the opening of the Museum the surrounding landscape of Britannia park shall be improved in accordance with a scheme of landscaping/public realm enhancements which shall first have been submitted to and approved in writing by the Local Planning authority prior to the commencement of development. The scheme shall include but not be limited to all hard and soft scape areas; enclosures; tree works and tree planting; play areas and play equipment; public art installations; seating; lighting and other landscape features in the context of a specific microclimate study. The finalised scheme shall include an Arboricultural Impact Assessment, Method Statement and Tree Protection Plan.

Reason: The development is only considered acceptable subject to the upgrading of the park in compensation for the reduction in the area of available public open space in accordance with policy C4 of the Adopted Cardiff Local Development Plan 2006-2026.

5. WASTE STORAGE FACILITIES

The waste storage facilities indicated on the approved plans shall be maintained for that purpose at all times.

Reason To ensure that there is an adequate facility for the storage of waste in accordance with Policy W2 of the Adopted Cardiff Local Development Plan 2006-2026

6. FUME EXTRACTION

Should the use of the site involve the cooking or reheating of food, all fumes from kitchens and preparation areas shall be mechanically extracted and deodorized before exiting the building in accordance with a scheme of detail which shall first have been submitted to and approved in writing by the Local Planning Authority in writing; no cooking of food shall take place at the premises until such time as the approved fume extraction system has been installed and made operational.

Reason: To mitigate against the potential for olfactory nuisance in accordance with the aims of policy EN13 of the Adopted Cardiff Local Development Plan.

7. FOUL DRAINAGE [WWDC]

Only foul water from the development site shall be allowed discharge to the public sewerage system and this discharge shall be made between manhole reference number ST19744201 and ST19743201 as indicated on the extract of the Sewerage Network Plan attached to this decision notice.

Reason: To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure

no pollution of or detriment to the environment in accordance with policy EN10 of the Adopted Cardiff Local Development Plan.

8. CONTAMINATION INVESTIGATION / MITIGATION and VERIFICATION PLAN [NRW]

Prior to the commencement of the development approved by this planning permission (or such other date or stage in the development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

1. A preliminary risk assessment which has identified;
  - a. all previous uses;
  - b. potential contaminants associated with those uses;
  - c. a conceptual model of the site indicating sources, pathways and receptors;
  - d. potentially unacceptable risks arising from contamination at the site.
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
3. The results of the site investigation and detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

Reason : The controlled waters at this site are of high environmental sensitivity and contamination is known/strongly suspected at the site from the previous use of the site in accordance with the aims of policy EN11 of the Adopted Cardiff Local Development Plan

9. VERIFICATION OF CONTAMINATION MITIGATION [NRW]

Prior to the beneficial use of any part of the development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that

the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, and for the reporting of this to the local planning authority. The long-term monitoring and maintenance plan shall be implemented as approved.

Reason : To demonstrate that the remediation criteria relating to controlled waters have been met and (if necessary) to secure longer-term monitoring of groundwater quality. This will ensure that there are no longer remaining unacceptable risks to controlled waters following remediation of the site in accordance with the aims of policy EN11 of the Adopted Cardiff Local Development Plan.

10. LONG TERM CONTAMINATION MONITORING PLAN [NRW]

Reports on monitoring, maintenance and any contingency action carried out in accordance with a long-term monitoring and maintenance plan shall be submitted to the local planning authority as set out in that plan. On completion of the monitoring programme a final report demonstrating that all long-term site remediation criteria have been met and documenting the decision to cease monitoring shall be submitted to and approved in writing by the local planning authority.

Reason : To ensure that longer term remediation criteria relating to controlled waters have been met. This will ensure that there are no longer remaining unacceptable risks to controlled waters following remediation of the site in accordance with the aims of policy EN11 of the Adopted Cardiff Local Development Plan.

11. UNFORSEEN CONTAMINATION [NRW]

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted and obtained written approval from the local planning authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved.

Reason : Given the size/complexity of the site it is considered possible that there may be unidentified areas of contamination at the site that could pose a risk to controlled waters if they are not remediated in accordance with the aims of policy EN11 of the Adopted Cardiff Local Development Plan.

12. GROUND GAS PROTECTION [CC CL]

Prior to the commencement of any development works a scheme to investigate and monitor the site for the presence of gases\* being generated at the site or land adjoining thereto, including a plan of the area to be monitored, shall be submitted to the Local Planning Authority for its approval.

Following completion of the approved monitoring scheme, the proposed details of appropriate gas protection measures to ensure the safe and

inoffensive dispersal or management of gases and to prevent lateral migration of gases into or from land surrounding the application site shall be submitted to and approved in writing to the LPA. If no protection measures are required than no further actions will be required.

All required gas protection measures shall be installed and appropriately verified before occupation of any part of the development which has been permitted and the approved protection measures shall be retained and maintained until such time as the Local Planning Authority agrees in writing that the measures are no longer required.

\* 'Gases' include landfill gases, vapours from contaminated land sites, and naturally occurring methane and carbon dioxide, but does not include radon gas. Gas Monitoring programmes should be designed in line with current best practice as detailed in CIRIA 665 and or BS8485 year 2007 Code of Practice for the Characterization and Remediation from Ground Gas in Affected Developments,.

Reason: To ensure that the safety of future users is not prejudiced in accordance with policy EN13 of the Cardiff Local Development Plan .

### 13. CONTAMINATED LAND MEASURES – ASSESSMENT [CC-CL]

Prior to the commencement of the development an assessment of the nature and extent of contamination shall be submitted to and approved in writing by the Local Planning Authority. This assessment must be carried out by or under the direction of a suitably qualified competent person \* in accordance with BS10175 (2011) Code of Practice for the Investigation of Potentially Contaminated Sites and shall assess any contamination on the site, whether or not it originates on the site.

The report of the findings shall include:

- (i) a desk top study to identify all previous uses at the site and potential contaminants associated with those uses and the impacts from those contaminants on land and controlled waters. The desk study shall establish a 'conceptual site model' (CSM) which identifies and assesses all identified potential source, pathway, and receptor linkages;
- (ii) an intrusive investigation to assess the extent, scale and nature of contamination which may be present, if identified as required by the desk top study;
- (iii) an assessment of the potential risks to:
  - human health,
  - groundwaters and surface waters
  - adjoining land,
  - property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes,

- ecological systems,
  - archaeological sites and ancient monuments; and
  - any other receptors identified at (i)
- (iv) an appraisal of remedial options, and justification for the preferred remedial option(s).

work and submissions carried out for the purposes of this condition must be conducted in accordance with DEFRA and the Environment Agency's 'Model procedures for the Management of Land Contamination, CLR 11' (September 2004) and the WLGA / WG / NRW guidance document 'Land Contamination: A guide for Developers' (2017), unless the Local Planning Authority agrees to any variation.

\* A 'suitably qualified competent person' would normally be expected to be a chartered member of an appropriate professional body (such as the Institution of Civil Engineers, Geological Society of London, Royal Institution of Chartered Surveyors, Institution of Environmental Management) and also have relevant experience of investigating contaminated sites.

Reason: To ensure that information provided for the assessment of the risks from land contamination to the future users of the land, neighbouring land, controlled waters, property and ecological systems is sufficient to enable a proper assessment in accordance with policy EN13 of the Cardiff Local Development Plan .

14. CONTAMINATED LAND MEASURES – REMEDIATION & VERIFICATION PLAN [CC-CL]

Prior to the commencement of the development a detailed remediation scheme and verification plan to bring the site to a condition suitable for the intended use by removing any unacceptable risks to human health, controlled waters, buildings, other property and the natural and historical environment shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include all works to be undertaken, proposed remediation objectives and remediation criteria, a timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

All work and submissions carried out for the purposes of this condition must be conducted in accordance with DEFRA and the Environment Agency's 'Model procedures for the Management of Land Contamination, CLR 11' (September 2004) and the WLGA / WG / NRW guidance document 'Land Contamination: A guide for Developers' (2017),, unless the Local Planning Authority agrees to any variation.

Reason: To ensure that any unacceptable risks from land contamination to the future users of the land , neighbouring land, controlled waters,

property and ecological systems are minimised, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with policy EN13 of the Cardiff Local Development Plan.

15. CONTAMINATED LAND MEASURES - REMEDIATION & VERIFICATION [CC-CL]

The remediation scheme approved by condition 16 must be fully undertaken in accordance with its terms prior to the occupation of any part of the development unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works.

Within 6 months of the completion of the measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out must be submitted to and approved in writing by the Local Planning Authority.

All work and submissions carried out for the purposes of this condition must be conducted in accordance with DEFRA and the Environment Agency's 'Model procedures for the Management of Land Contamination, CLR 11' (September 2004) and the WLGA / WG / NRW guidance document 'Land Contamination: A guide for Developers' (2017), unless the Local Planning Authority agrees to any variation.

Reason : To ensure that any unacceptable risks from land contamination to the future users of the land , neighbouring land, controlled waters, property and ecological systems are minimised, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with policy EN13 of the Cardiff Local Development Plan.

16. CONTAMINATED LAND MEASURES – UNFORESEEN CONTAMINATION [CC-CL]

In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing within 2 days to the Local Planning Authority, all associated works must stop, and no further development shall take place unless otherwise agreed in writing until a scheme to deal with the contamination found has been approved. An investigation and risk assessment must be undertaken and where remediation is necessary a remediation scheme and verification plan must be prepared and submitted to and approved in writing by the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing by the Local Planning Authority. The timescale for the above actions shall be agreed with the LPA within 2 weeks of the discovery of any unsuspected contamination.

Reason: To ensure that any unacceptable risks from land contamination

to the future users of the land , neighbouring land, controlled waters, property and ecological systems are minimised, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with policy EN13 of the Cardiff Local Development Plan.

17. IMPORTED SOIL [CC-CL]

Any topsoil [natural or manufactured], or subsoil, to be imported shall be assessed for chemical or other potential contaminants in accordance with a scheme of investigation which shall be submitted to and approved in writing by the Local Planning Authority in advance of its importation. Only material approved by the Local Planning Authority shall be imported. All measures specified in the approved scheme shall be undertaken in accordance with the relevant Code of Practice and Guidance Notes.

Subject to approval of the above, sampling of the material received at the development site to verify that the imported soil is free from contamination shall be undertaken in accordance with a scheme and timescale to be agreed in writing by the LPA.

Reason: To ensure that the safety of future occupiers is not prejudiced in accordance with policy EN13 of the Cardiff Local Development Plan.

18. IMPORTED AGGREGATES [CC-CL]

Any aggregate (other than virgin quarry stone) or recycled aggregate material to be imported shall be assessed for chemical or other potential contaminants in accordance with a scheme of investigation which shall be submitted to and approved in writing by the Local Planning Authority in advance of its importation. Only material approved by the Local Planning Authority shall be imported. All measures specified in the approved scheme shall be undertaken in accordance with the relevant Code of Practice and Guidance Notes.

Subject to approval of the above, sampling of the material received at the development site to verify that the imported material is free from contamination shall be undertaken in accordance with a scheme and timescale to be agreed in writing by the LPA.

Reason: To ensure that the safety of future occupiers is not prejudiced in accordance with policy EN13 of the Cardiff Local Development Plan.

19. USE OF SITE WON MATERIALS [CC-CL PC15B]

Any site won material including soils, aggregates, recycled materials shall be assessed for chemical or other potential contaminants in accordance with a sampling scheme which shall be submitted to and approved in writing by the Local Planning Authority in advance of the reuse of site won materials. Only material which meets site specific target values approved by the Local Planning Authority shall be reused.

Reason: To ensure that the safety of future occupiers is not prejudiced



in accordance with policy EN13 of the Cardiff Local Development Plan.

20. HISTORIC ENVIRONMENT MITIGATION

No development shall take place until the applicant, or their agents or successors in title, has secured agreement from the Local Planning Authority for a written scheme of historic environment mitigation; the scheme shall comprise of four parts which will provide for:

- (i) An archaeological watching brief relating to all ground works and the submission of a report to the National archive.
- (ii) A drawn, written, and photographic record of the building described in the application as the 'Lock keepers cottage' together with a detailed methodology of how it is intended to move the structure to its new location
- (iii) A photographic record of the undertaking of the works,
- (iv) A photographic and written account of the reconstruction of the building.

The archaeological work must be undertaken to the appropriate Standard and Guidance set by the Chartered Institute for Archaeologists (CIfA), and be carried out either by a CIfA Registered Organisation or an accredited MCIfA Member.

Reason: To identify and record any features of archaeological interest discovered during the works, in order to mitigate the impact of the works on the archaeological resource, and to capture the history, location and building technology of the lock keepers cottage at a point in time before it is moved; to mitigate against any risk to the building during the course of the works; and to record the exercise of reconstruction for the benefit of future research in accordance with policy KP17 and EN9 of the Adopted Cardiff Local Development Plan.

21. REBUILDING OF THE LOCK KEEPERS COTTAGE

The Lock Keeper's Cottage shall be rebuilt exactly as existing before deconstruction in accordance with the methodology approved under condition 20 before the opening of the museum to the public.

Reason: To ensure for the timely reconstruction of the building and prevention of damage to it in accordance with policy KP17 and EN9 of the Adopted Cardiff Local Development Plan.

22. PUBLIC PROTECTION DETAILS

The scheme of Urban Realm enhancements required by condition 4 shall include for appropriate methods of separating vehicles and pedestrians in critical areas e.g. a mix of street furniture/ bollards/ planters/gradients / levels to prevent vehicle impingement into the building and / or event space outside.

Reason: To ensure for the safety and security of users of the museum and adjacent park in accordance with policy C3 of the Adopted Cardiff Local Development Plan.

23. **LIGHTING**  
Prior to beneficial use, the building and immediate demise shall be illuminated in accordance with a lighting scheme which shall first have been submitted to and approved in writing by the Local Planning Authority. The scheme shall include for full details of lighting fittings; a LUX plan and details of lighting timing and intensity.  
Reason: To ensure persons visiting/ working in the area feel safe, and that lighting will not adversely impact on residents or or protected species by virtue of light pollution in accordance with policies C3 and EN7 of the Adopted Cardiff Local Development Plan.
24. **CCTV**  
Prior to beneficial use, the museum shall be provided with a scheme of closed circuit television to cover interior and exterior spaces and all access points in accordance with a specification and details to be first agreed by the Local Planning Authority in writing.  
Reason: To deter actual and potential crime in accordance with policy C3 of the Adopted Cardiff Local Development Plan.
25. **PUBLICLY ACCESSIBLE FACILITIES**  
Free public access to the café, toilet facilities and retail shop on the ground floor of the museum shall be available to the general public at all hours when the museum is open.  
Reason: The development is only acceptable on the basis of freely accessible facilities for users of the park and surrounding area in accordance with Policy C4 of the Adopted Cardiff Local Development Plan.
26. **ACCESS CONTROL**  
Prior to the first beneficial use of the museum, access controls shall be provided to all restricted areas or pay to view areas of the museum in accordance with a scheme of detail which shall first have been agreed in writing by the Local Planning Authority and the access controls shall thereafter be so maintained.  
Reason: To ensure for the safety and security of users and staff within the museum and users of the area generally in accordance with policy C3 of the Adopted Cardiff Local Development Plan.
27. **PUBLIC ADDRESS**  
Prior to beneficial use the museum shall be provided with a public address system to allow ease of communication between staff and visitors  
Reason: In the interests of the safety of users in accordance with policy C3 and KP5 of the Adopted Cardiff Local Development Plan.
28. **MATERIALS SPECIFICATION**  
The building shall be completed in accordance with a detailed schedule of external materials and finishes (including submission of samples where requested) which shall first have been submitted to and agreed in writing by the Local Planning Authority.

Reason: To ensure for a high quality aesthetic to the building in accordance with Policy KP5 of the Adopted Cardiff Local Development Plan.

29. CEMP (CC-SRS-SPT-SWP)

Prior to the commencement of development, a Construction Environmental Management Plan must be submitted to and agreed in writing by the local planning authority; the plan must specify as a minimum, , site access and wheel washing facilities. construction traffic routes, site hoarding, phasing of works, contractor and plant parking/locations; hours of working and details of measures specific to the control of contamination, noise mitigation and for controls of noise as per the Code of Practice for noise and vibration control of construction and open sites BS5228 (latest edition) as a result of the proposed on-site activities; and dust suppression, paying particular consideration to neighbouring operations and activities at the Norwegian Church and Atradius Office accommodation; The scheme must thereafter be implemented and maintained in accordance with the approved details unless otherwise agreed in writing by the local planning authority.

Reason: to protect the amenities of occupiers of other premises in the vicinity in accordance with the aims of Policy EN13 of the Adopted Cardiff Local Development Plan and in the interests of highway safety and public amenity.

30. CYCLE PARKING PROVIISON

No development shall take place until details showing the provision of cycle parking spaces have been submitted to and approved in writing by the local planning authority. The approved details shall be implemented prior to the development being put into beneficial use. Thereafter the cycle parking spaces shall be maintained and shall not be used for any other purpose.

Reason: To ensure that adequate provision is made for the secure parking of cycles.in accordance with Policy KP8 of the Adopted Cardiff Local Development Plan.

31. PUBLIC ART RETENTION

The scheme of Urban Realm enhancements required by condition 4 shall include for appropriate relocation of any existing pieces of public art as ay be affected by the development of the Museum.

Reason: The public art is recognized as making a positive contribution to the amenity of visitors and users of the park and it's loss would be contrary to the aims of Policies KP5 and KP6 of the Adopted Cardiff Local Development Plan 2006-2026.

**RECOMMENDATION 2 :** That the applicant/agent be advised of the following:  
*Natural Resources Wales strongly recommend that developers should:*

- *Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.*
- *Refer to WLGA document 'Development of Land Affected by*

*Contamination: A Guide for Developers' (2017) for the type of information that we require to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.*

- Refer to the groundwater protection pages on Gov.UK <https://www.gov.uk/government/collections/groundwater-protection>
- Refer to British Standard for the Investigation of Potentially Contaminated Sites. Code of Practice (BS10175:2011)

**RECOMMENDATION 3** : NRW advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our website for further details.

#### Advice for the Developer

The treatment and disposal of contaminated soils and groundwater is regulated by waste legislation and requires an environmental permit.

Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on site operations are clear. If in doubt, the Natural Resources Wales should be contacted for advice at an early stage to avoid any delays.

Natural Resources Wales recommends that developers should refer to our:

- Position statement on the Definition of Waste: Development Industry Code of Practice and;
- website at [www.naturalresourceswales.gov.uk](http://www.naturalresourceswales.gov.uk) for further guidance. Contaminated soil that is excavated, recovered or disposed of, is controlled waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:
- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2010

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed off site operations is clear. If in doubt, the Natural Resources Wales should be contacted for advice at an early stage to avoid any delays. If you have any queries on the above, please do not hesitate to contact us.

**RECOMMENDATION 4** : The contamination assessments and the effects of unstable land are considered on the basis of the best information available to the Planning Authority and are not necessarily exhaustive. The Authority takes due diligence when assessing these impacts, however you are minded

that the responsibility for

- (i) determining the extent and effects of such constraints and;
- (ii) ensuring that any imported materials (including, topsoils, subsoils, aggregates and recycled or manufactured aggregates / soils) are chemically suitable for the proposed end use. Under no circumstances should controlled waste be imported. It is an offence under section 33 of the environmental Protection Act 1990 to deposit controlled waste on a site which does not benefit from an appropriate waste management license. The following must not be imported to a development site:
  - Unprocessed / unsorted demolition wastes.
  - Any materials originating from a site confirmed as being contaminated or potentially contaminated by chemical or radioactive substances.
  - Japanese Knotweed stems, leaves and rhizome infested soils. In addition to section 33 above, it is also an offence under the Wildlife and Countryside Act 1981 to spread this invasive weed; and
- (iii) the safe development and secure occupancy of the site rests with the developer.

Proposals for areas of possible land instability should take due account of the physical and chemical constraints and may include action on land reclamation or other remedial action to enable beneficial use of unstable land.

The Local Planning Authority has determined the application on the basis of the information available to it, but this does not mean that the land can be considered free from contamination.

**RECOMMENDATION 5** : The applicant may need to apply to Dwr Cymru / Welsh Water for any connection to the public sewer under S106 of the Water industry Act 1991. If the connection to the public sewer network is either via a lateral drain (i.e. a drain which extends beyond the connecting property boundary) or via a new sewer (i.e. serves more than one property), it is now a mandatory requirement to first enter into a Section 104 Adoption Agreement (Water Industry Act 1991). The design of the sewers and lateral drains must also conform to the Welsh Ministers Standards for Gravity Foul Sewers and Lateral Drains, and conform with the publication "Sewers for Adoption"- 7th Edition. Further information can be obtained via the Developer Services pages of [www.dwrcymru.com](http://www.dwrcymru.com).

The applicant is also advised that some public sewers and lateral drains may not be recorded on our maps of public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect the proposal. In order to assist us in dealing with the proposal the applicant may contact Dwr Cymru Welsh Water to establish the location and status of the apparatus. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

**RECOMMENDATION 6** : South Wales Police would welcome further dialogue with the applicant regarding management and operational procedures at the museum.

**RECOMMENDATION 7** : New developments where the area covered by construction work exceeds 100 square metres also require approval from the SuDS Approval Body (SAB) before construction can commence. Adoption and management arrangements, including a funding mechanism for maintenance of SuDS infrastructure and all drainage elements are to be agreed by the SAB as part of this approval. This will ensure that SuDS infrastructure is properly maintained and functions effectively for its design life. The developer is reminded to obtain all necessary approvals ahead of the commencement of development.

**RECOMMENDATION 8** : The applicant is advised that section 3.25 of Planning Policy Wales states that the land use planning system should take account of the conditions which are essential to the Welsh language and in so doing contribute to its use and the Thriving Welsh Language well-being goal. In this context and with regard to the Welsh Language (Wales) Measure 2011, it is recommended that: (1) developments adopt a Welsh name that is consistent with the local heritage and history of the area, (2) during the construction phase, on site marketing information (i.e. text on construction hoardings / flags / banners – as consented) be provided bilingually and (3) for commercial developments, shopfront / premises signage be provided in Welsh or bilingually. Where bilingual signage is provided, Welsh text must not be treated less favourably in terms of size, colour, font, prominence, position or location (it is recognised that Welsh translation does not extend to company / business names). Cardiff Council's Bilingual Cardiff team (BilingualCardiff@cardiff.gov.uk) can provide advice on unique and locally appropriate Welsh names for developments, bilingual marketing / branding and bilingual signage.

## 1. **DESCRIPTION OF PROPOSED DEVELOPMENT**

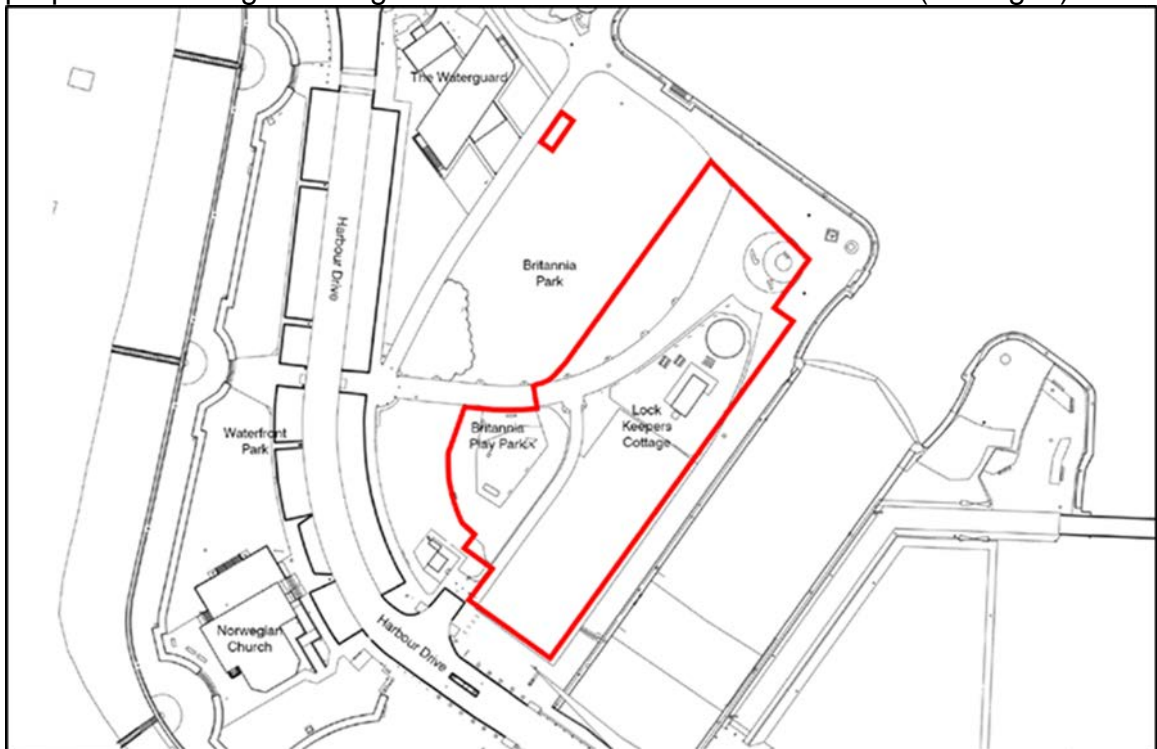
- 1.1 Full planning permission is sought for the construction of a museum (Use Class D1) on some 2670sqm of land adjacent to the Origami bridge at Britannia Park in Cardiff Bay.
- 1.2 The building would be orientated on a SW-NE axis, and would parallel the outer lock crossing of Roath Basin. The building would measure approximately 70m in length, would be approximately 24m in width and be approximately between 15.9m and 21.3m tall at its two principal roof heights, returning a gross internal area of 4733sqm within a building of part 4 and part 5 storeys.
- 1.3 Aesthetically, the building would present two distinctively different visual elements. A fully glazed flat roofed cuboid element to the SW and a Red Oxide saw-tooth roof element to the NE.
- 1.4 The proposed building would be located in the south eastern corner of

Britannia Park, and would, for the most part, be located on a large area of gravel (770m<sup>2</sup>), which formally provided a base for 'The Tube' building, (an exhibition space and visitor centre for Cardiff Bay dismantled and removed from the site in 2010). The building would however stretch beyond the gravel area into the landscaped area of the park to the north east and partially into the area currently forming part of the children's play park to the Northwest.

- 1.5 The proposed Museum would necessitate the relocation of the Grade II listed 'Lock Keepers Cottage' (Likely a non residential workman's hut serving the former swing bridge which once crossed the outer lock but which was removed in the 1990s).

## 2. **DESCRIPTION OF SITE**

- 2.1 Britannia Park is located to the Southwest corner of Roath Basin, which was once a sea locked dock providing shipping access between the tidal Cardiff Bay and Roath Dock and a number of dry docks. Britannia Park is of body of irregular shape of approximately 7703m<sup>2</sup>, The principal area of the park parallels the northern edge of the outer lock of Roath Basin and is bounded by the Harbour Drive and Britannia Quay Highways. The park consists of part hard and part soft landscaped areas of open space which includes a grassed area, a children's play area; a hardscaped area of pavours; the 'Beastie Benches' (public art) and a small single storey stone built slate roofed building which was historically a workman's hut, as well as the aforementioned area of gravel chippings. Buildings cover approximately 316m<sup>2</sup> of the park currently.
- 2.2 The application site is also irregular in shape, but also roughly parallels the northern edge of the outer lock. It is drawn close to the perimeter of the proposed building covering an area around 90m x 30m / 2700m<sup>2</sup>(averages).



- 2.3 Harbour drive is an adopted highway up until its connection with the origami bridge. Thereafter Teigr way is a private road owned by Welsh Government. The Origami bridge is fitted with rising bollard barriers to prevent general access to Porth Teigr by cars other than at times when the inner lock (Tyneside Road) swing bridge is open (Road closed), or at times where there would be a need to evacuate the docks. The Origami bridge generally only allows passage to pedestrians, cyclists, buses and emergency service vehicles and so traffic use of this end of Harbour drive is light, as it only provides access to a limited number of adjacent car parking spaces which parallel the highway.
- 2.4 The site experiences a relative and continuous passing of pedestrians and cyclists accessing the barrage access path as a route to and from Penarth and Teigr way to access the BBC Roath Lock Studios. Harbour drive also provides the principal access between the Norwegian Church and other visitor attractions in the bay, the Oval Basin and Mermaid Quay shopping centre as well as for Office workers and residents of accommodation sited to the North of Roath Basin.
- 2.5 Although used for many years as a recreational space, Britannia park has previously been within the ownership of Associated British Ports. However the application site and remainder of Britannia Park have relatively recently (Dec 2018) been acquired by the Council.
- 2.6 In terms of character, the immediate surrounds present a rather incoherent mix of public and private vehicle carriageway, parking areas, undeveloped land with temporary uses, and further open space.
- 2.7 The application site is bounded by the perimeter pedestrian walkway around Roath basin to east and south, the remaining area of Britannia park to the North and is separated from Harbour Drive by a group of trees/landscaping bund.
- 2.8 The site is located approximately 30m South of the Grade II Listed Waterguard Public House, 30m from the undesignated Norwegian Church, 60m south of the Atradius Office development, 175m from the "Senedd" and 240m from the Grade I Listed Pierhead building. The site abuts the Pierhead Conservation Area and is visible from the Mount Stuart Square Conservation Area., but is not designated as being of architectural or historic interest in itself.
- 2.9 The site is approximately 500m from the Mermaid Quay, and Bute Place Car Parks and 600m from the Cardiff Bay Railway Station. The nearest bus stop is approximately 75m away on Britannia Quay.
- 2.10 The site is located within the Bay Business Area (BBA) of the Adopted Cardiff Local Development Plan 2006-2026.
- 2.11 The site falls predominantly within Development Advice Map Flood Zone B, however a very small part of the perimeter of the site falls within Flood Zone C2.



- 2.12 The waters of Cardiff Bay are managed by Cardiff Harbour Authority and of the Roath Basin by Associated British Ports.
- 2.13 The site is more than 450m from any part of the COMAH safety zone notified to the Local Authority by the Health and Safety Executive.
- 2.14 Given the open nature and gravel surfacing of the application site, its use is mostly seasonal, and for temporary events.

### 3. **SITE HISTORY**

- 3.1 20/01357 – Planning Permission for provision of a Ferris wheel for temporary periods for the next 5 summer seasons Granted August 2020.
- 3.2 17/01848/MJR - Outline planning permission for redevelopment of the site to provide a new landmark building of up to 24 storeys in height, a revised park and additional bay edge buildings and re-location of the former workmen's hut - Withdrawn
- 3.3 09/01953C - Proposed Skyflieger Aerostat , gondola, landing platform , sea platform and bridge (North side of Roath Basin Lock) - Withdrawn.
- 3.4 09/01424C - Proposed Skyflieger Aerostat balloon, gondola and landing platform (Britannia Park) - Refused .
- 3.5 08/02713C - Proposed Hyflieger balloon, gondola, landing platform and winch house (Britannia Park) -Approved. Decision quashed at Judicial Review
- 3.6 08/01497C - Ferris Wheel from July to September 2008.- Granted
- 3.7 07/00462C- Construction of a themed adventure golf course with entrance and lighthouse feature.- Refused
- 3.8 94/00305R - Renewal of Outline PP 90/00479R. - Granted
- 3.9 90/00479R – [Development of Roath Basin, North Side] Outline Planning Permission for mixed uses: 800,000 sq ft office space plus retailing, residential, hotel, opera house, leisure uses, visitor centre and Public Open Space. - Granted

#### **Other Development history**

- 3.10 03/00099 - [Outline Planning Permission for the Development of Roath Basin - South Side] Granted 01/07/2008
- 3.11 09/01672 – Variation of Conditions of 03/00099 [Including Revised Masterplan] Granted 25/03/2015.
- 3.12 09/02120 - Full Planning Permission BBC Roath Lock Studios. Granted

- 3.13 19/01426 - Proposed temporary (30 weeks) recreational zip line development from the roof of St David's Hotel, to the Norwegian Church - Withdrawn. 07/11/2019.

#### 4. **POLICY FRAMEWORK**

##### 4.1 National Policy

Planning Policy Wales (Edition 10) December 2018

##### 4.2 Technical Advice Notes

Tan 12 : Design (March 2016)

Tan 13: Tourism (October 1997)

Tan 15: Development and Flood Risk (July 2004)

Tan 16 : Sport Recreation and Open Space (January 2009)

Tan 18: Transport (March 2007)

Tan 23: Economic Development (February 2014)

Tan 24: The Historic Environment (May 2017)

##### 4.3 Local Policy

Cardiff Local Development Plan 2006- 2026 (Adopted January 2016)

KP5: Good Quality and Sustainable Design

KP7: Planning Obligations

KP8: Sustainable Transport

KP10: Central and Bay Business Areas

KP15: Climate Change

KP17: Built Heritage

EN3: Landscape Protection

EN4: River Corridors

EN8: Trees, woodlands and Hedgerows

EN9: Conservation of the Historic Environment

EN12: Renewable Energy and Low Carbon Technologies

EN13: Air, Noise, Light Pollution and Land Contamination

EN14: Flood Risk

TI: Walking and Cycling

TS: Managing Transport Impacts

T6: Impact on Transport Networks and Services

R8: Food and Drink Uses

C3: Community Safety/Creating Safe Environments

C4: Protection of Open Space

CS: Provision for Open Space, Outdoor Recreation, Children's Play and Sport

W2: Provision for Waste Management Facilities in Development

Supplementary Planning Guidance (SPG's) - Including Conservation Area Appraisals

Waste Collection and Storage Facilities (October 2016)

Planning Obligations (January 2017)  
Managing Transportation Impacts (incorporating Parking Standards) (July 2018)  
Green Infrastructure (Including - Trees and Development TGN) (March 2007)  
Archaeology and Archaeologically Sensitive Areas (July 2018)  
Food, Drink and Leisure Uses (November 2017)  
Public Art (June 2006)

The Pierhead Conservation Area Appraisal 2009  
The Mount Stuart Square Conservation Area Appraisal 2009

Other Legislation, Regulation and Guidance

The Cardiff Bay Barrage Act  
Wellbeing of Future Generations Act  
One Planet (Consultation at time of writing)

## 5. **INTERNAL CONSULTATIONS**

### 5.1 **Transportation Officer**

Transportation Observations 19/02506/MJR.

The construction of a military medicine museum on land forming part of Britannia Park, Harbour Drive. The building would compose of two distinct elements, a full glazed flat roofed box to its south-western end and partially fretted corten skin finished building with sawtooth roof design along the rest of its length. The development includes for the deconstruction and re-siting of lock keepers cottage. Land off Harbour Drive, Cardiff Bay, Cardiff

I refer to the above application and would confirm that the submission has been assessed and is considered to be acceptable in principle subject to the comments and conditions detailed below.

Comments:

The application seeks to relocate the existing Museum of Military Medicine (MMM) facility that is located on barracks and not readily accessible to the public, to a more accessible location housed in a new purpose built facility. The submission advises that the new facility aims to provide a 'world class visitor attraction' that is fully accessible and includes a mix of conferencing, retail, catering, exhibitions and event spaces.

The building footprint is approx. 70m x 24m, with an overall floor area of 4733sq/m, and will be located in the south east corner of Britannia Park, parallel to the dock. The proposed building location requires the relocation of the Lock Keepers Cottage and children's play area, along with a number public art benches. The site previously accommodated 'The Tube', an exhibition space/visitor centre, but has otherwise been vacant for a number of years.

The applicant has submitted two transport statements (TS), an initial one with the application that was followed up with a second some three months later. The statements do not vary significantly in their assessment of the context, available transport options and projections as to the number and nature of trips the museum might generate. However the later statement examines the proposed development in significantly more detail and provides a greater level of background material. The TS are supported by the information in the submitted Design and Access Statement.

In summary the statements confirm the area is well served by existing transport infrastructure including major road and rail links to the city centre and beyond; and is located on the strategic cycle network and is easily accessible by foot. In addition to which that the majority of trips will be combined with visits to other attractions and as such the predicted visitor numbers do not represent new trips to be added to existing. Predicted peak visits also primarily happen on the weekend and at times when commuter traffic is at its lowest.

Looking at the submitted statements, based on data from other similarly sized museums and galleries, the applicant anticipated (pre pandemic) annual visitor numbers to the museum of circa 175,000 in 2023, rising to 225,000 by 2025.

During the week the applicant estimates that there might be some 430 visitors daily, (860 person journeys) likely split between 44% arriving by foot; 25% by bus; 11% by rail; 9% by car; 4% as single person car users; 5% by coach and 0.3% by cycle. On Saturdays, there might be increased patronage to circa 950 visitors (1,900 person journeys) with a greater bias towards car usage (52%); 27% by foot; 19% using public transport and 1% travelling by cycle.

To put these visitor numbers into perspective, there are around 20 million tourist trips (day/holiday trips) to Cardiff as a whole annually; and of these around 55% will travel to the Bay, amounting to circa 11 million tourist trips to the Bay annually. In reality therefore, while the headline of circa 950 visitors (1,900 visitor trips) on a Saturday sounds significant, the impact when considered in the context of existing trips and in the understanding that the majority of trips will be linked rather than wholly new, confirms that the impact can be accommodated by the existing infrastructure.

In terms of accessibility the site is located within easy reach of good quality walking and cycling active travel infrastructure/opportunities, along with access to sustainable transport options with bus and train services within a short level walk. The site is also conveniently located in terms of car private transport, with access to nearby car parking and the local, and strategic highway networks.

There are a number of bus stops within easy level walk of the site, giving access to a wide range of services, both high frequency local and wider destinations, and onward connections. The nearest bus stops being adjacent to the Millennium Centre and on Pierhead Street with the Baycar providing a frequent service to the City Centre. Cardiff Bay railway station is also located

approximately 850m north of the site, and provides a shuttle service between Cardiff Queen Street and Cardiff Bay.

No dedicated car parking is proposed with the development and this is considered to be inline the Council's transport Supplementary Planning Guidance, which seeks to minimize reliance on car based journeys and maximize the use of public transport and active travel. There are however a number of surface level and multi storey car parks within close proximity of the site, as well as on street parking bays on Harbour Drive, including a number of disable spaces near the Norwegian Church.

In respect of the operation and management of the museum, the submission advises that exhibition and café deliveries will be infrequent and as such will be managed outside of peak traffic hours. Waste and recycling collections will to be undertaken by commercial contract, with the management being the responsibility of the contractor. The day to day operation of the museum is therefore considered to be comparable with other publically accessible/commercial operations in the area and as such acceptable.

A number of objectors have been submitted and I would offer the following comments:

Lack of car parking/disabled parking –

The proposed development is located in the Central and Bay Area as identified by the Managing Transport Impacts SPG, and as such attracts zero car parking spaces for both visitors and staff. In considering this objection I would reiterate that the site is in a sustainable location with very good access to public transport, walking and cycling. For those visitors that choosing to drive, ample existing car parking is also available in the area, with a 1200 space multi-storey car park some 500m north of the site. There are also three dedicated disabled spaces in front of the Norwegian Church and Blue Badge holders car park for free in the on-street Pay & Display spaces. The proposal is therefore considered both policy compliant and otherwise acceptable in terms of parking impact.

Concern over the adequacy of the traffic/visitor impact analysis detailed in the Transport Statement –

While questioning the validity of the visitor projection, objectors report concerns that the estimated 225,000 annual visitors amount will amount to an average of 200 car based journeys per day, even with Council's 50:50 modal split being achieved. However (even assuming this figure is accepted) as discussed elsewhere in my comments it must be understood that these are not going to be 200 new trips or 225,000 new annual individual visitors (trips) in traffic terms. The 225,000 annual visits will primarily consist of linked trips that are combined with and therefore part of the existing background leisure trips generated by Cardiff and the Bay. The vast majority of visitors will also be traveling as part of a group or with family members, rather than individually, further reducing the additional headline traffic impact of the development.

As also discussed elsewhere in my comments, Cardiff attracts in the region of 20 million visitor trips a year, with an estimated 11 million of those visiting the Bay, as such any new trips will represent a very small percentage of existing.

Inspection of the TRICS data submitted in the TS also identifies that the peak visitor trips occur between 10AM and 4PM and that the busiest days will be on weekends, with very little impact recorded during either the AM or PM commuter weekday peaks. Visitor trips to the proposed museum will therefore have a negligible impact on current peak hour commuter trips and as discussed the number of wholly new trips generated by the museum will be relatively small.

Conditions:

Standard Cycle Parking condition – C3S;

Construction management plan condition – No part of the development hereby permitted shall be commenced until a scheme of construction management has been submitted to and approved in writing by the Local Planning Authority, to include as required but not limited to details of site hoardings, site access and wheel washing facilities. Construction of the development shall be managed strictly in accordance with the scheme so approved. Reason: In the interests of highway safety and public amenity.

Conclusion:

The application is considered to be policy compliant and the transport analysis provided by the applicant an acceptable assessment of the potential traffic impact. It is therefore concluded that there is sufficient capacity and flexibility within the existing transport network to accommodate the projected visitor numbers and other operational impacts of the proposed museum.

I therefore have no objection to the application as submitted, subject to the above comments and requested planning conditions.

## 5.2 **Drainage**

The Development will need to be considered by the Council as Sustainable Drainage Approving Body.

The architect has been asked to provide a statement which confirms how it is intended that the development address the key principles of Sustainable Drainage 'SUDs' (which will be necessary in order to obtain approval of the Council as Sustainable Drainage Approval Body (SAB approval). *This has been done.*

## 5.3 **Parks**

The Development involves a loss of open space.

Much of the space occupied by the Museum is laid to gravel but there is also some impact on the play area and part of the grass area (558m<sup>2</sup>), both of which are regularly used by the public.

The presence of a café and toilets accessible to the public within the building would have major benefit to people using the surrounding open spaces.

The DAS indicates that 'the children's play area would lose approximately 130m<sup>2</sup> of space but as much of it is laid to grass without play equipment it is felt that the play space could be better configured to make use of the remaining area'. I make a number of points on this :

- There is currently no largescale detailed plan indicating how the play area will be affected. This is essential to establish whether the building will impinge on the grass area only or upon the safety zones of the current equipment, determining whether the main equipment would need to be moved or just minor items of equipment relocated. The equipment currently present is of variable condition and age but any relocation of equipment and safety surfacing would require funding. The current play area is widely used by a number of families living locally as well as people visiting Britannia Quay.
- The entrances to the play area are located on the opposite side of the building and so will be unaffected by the Museum.
- During construction of the building consideration needs to be given as to whether the play area will need to be closed for safety reasons and loss of the play facility for any period of time is unlikely to be seen as acceptable by the public. However Parks have no objection to its relocation if a suitable site and funding can be found and it represents an opportunity to provide a new high quality play environment to enhance the open space.
- Longer term, having the play area so close to the new building may not be desirable for either the play area or Museum, so it is advisable that proposals are considered for an alternative location. I understand that a landscape study is due to be undertaken to cover this area up to the barrage and this would need to identify an alternative location for the play area and sources of funding. Much depends on the timescale for construction of the building as alterations to the play area would not be required until just before building work is due to start.

On the trees I have nothing further to add to the comments of the Strategic Planning Tree Officer.

I have some concerns that the appearance of the substation could detract from the key entrance to the Museum so I would suggest that options are looked at to determine if it's visual impact could be reduced e.g. by planting or screening / fencing of some sort.

## 5.4 Pollution Control

### Noise

Request the following conditions:

#### *PC4 HOURS OF OPERATION*

*No activities shall be carried out which create noise audible at the boundary of any residential accommodation between the hours of 23:00 and 08:00 on any day*

*Reason: To ensure that the amenities of occupiers of other premises in the vicinity of the site are protected.*

#### *PC5 OPENING HOURS*

*No member of the public shall be admitted to or allowed to remain on the premises between the hours of 23:00 and 08:00 on any day.*

*Reason: To ensure the amenity of occupiers of other premises in the vicinity are protected.*

#### *PC6 DELIVERY TIMES*

*There shall be no arrival, departure, loading or unloading of delivery vehicles between the hours of 20:00 and 08:00 on any day.*

*Reason: To ensure that the amenities of occupiers of other premises in the vicinity are protected.*

#### *PLANT NOISE (2015)*

*Prior to implementation a noise assessment shall be carried out and submitted to the Local Planning Authority to ensure the noise emitted from fixed plant and equipment on the site achieves a rating noise level of background -10dB at the nearest noise sensitive premises when measured and corrected in accordance with BS 4142: 2014 (or any British Standard amending or superseding that standard).*

*Reason: To ensure that the amenities of occupiers of other premises in the vicinity are protected, in accordance with policy 2.24 of the deposit Unitary Development Plan*

#### *R1 CONSTRUCTION SITE NOISE*

*To protect the amenities of occupiers of other premises in the vicinity attention is drawn to the provisions of Section 60 of the Control of Pollution Act 1974 in relation to the control of noise from demolition and construction activities. Further to this the applicant is advised that no noise audible outside the site boundary adjacent to the curtilage of residential property shall be created by construction activities in respect of the implementation of this consent outside the hours of 0800-1800 hours Mondays to Fridays and 0800 - 1300 hours on Saturdays or at any time on Sunday or public holidays. The applicant is also advised to seek approval for any proposed piling operations.*

#### *CONSTRUCTION SITE DUST*

*Prior to the commencement of development, a Construction Environmental Management Plan (or equivalent) must be submitted and agreed in writing by the local planning authority which specifies provisions for controls of noise as per the Code of Practice for noise and vibration control of construction and open sites BS5228 (latest edition) as a result of the proposed on-site activities. The scheme*



*must be implemented and maintained in accordance with the approved details unless otherwise agreed in writing by the local planning authority.*

*Reason: to protect the amenities of occupiers of other premises in the vicinity.*

### Odours

#### *PC9a KITCHEN EXTRACTION*

*The extraction of all fumes from the food preparation areas shall be mechanically extracted to a point to be agreed in writing by the Local Planning Authority, and the extraction system shall be provided with a de-odouring filter. All equipment shall be so mounted and installed so as not to give rise to any noise nuisance. Details of the above equipment including the chimney shall be submitted to, and approved by, the Local Planning Authority in writing and the equipment installed prior to the commencement of use for the cooking of food. The equipment shall thereafter be maintained in accordance with the manufacturers' guidelines, such guidelines having previously been agreed by the Local Planning Authority in writing.*

*Reason: To ensure that the amenities of occupiers of other premises in the vicinity are protected.*

#### *KITCHEN EXTRACTION NOISE*

*Prior to implementation a noise assessment shall be carried out and submitted to the Local Planning Authority to ensure the noise emitted from kitchen plant and equipment on the site achieves a rating noise level of background -10dB at the nearest noise sensitive premises when measured and corrected in accordance with BS 4142: 2014 (or any British Standard amending or superseding that standard).*

*Reason: To ensure that the amenities of occupiers of other premises in the vicinity are protected, in accordance with policy 2.24 of the deposit Unitary Development Plan*

### Air Quality

No comments received

### Contamination

In reviewing available records and the application for the proposed development, the site has been identified as formerly commercial/industrial including commercial docks with associated rail and other infrastructure. Activities associated with this use may have caused the land to become contaminated and therefore may give rise to potential risks to human health and the environment for the proposed end use.

In addition former landfill sites have been identified within 250m of the proposed development. Such sites are associated with the generation of landfill gases, within subsurface materials, which have the potential to migrate to other sites. This may give rise to potential risks to human health and the environment for the proposed end use.

The history of the site and risk to human health and the environment from associated potential contamination is acknowledged within the applicant's Design and Access Statement; this also refers to previous geo-environmental investigations at the site.

A robust contamination and ground gas assessment of the site, in line with current guidance and in the context of the above proposed development, is required to identify any associated risks and to determine whether further assessment and/or remediation is required to ensure the site is made suitable for use.

Should there be any importation of soils to develop the landscaped areas of the development, or any site won recycled material, or materials imported as part of the construction of the development, then it must be demonstrated that they are suitable for the end use. This is to prevent the introduction or recycling of materials containing chemical or other potential contaminants which may give rise to potential risks to human health and the environment for the proposed end use.

Shared Regulatory Services would request the inclusion of the following conditions and informative statements in accordance with CIEH best practice and to ensure that the safety of future occupiers is not prejudiced in accordance with policy EN13 of the Cardiff Local Development Plan:

#### *CONDITIONS*

*PC13 - GROUND GAS PROTECTION*

*PC14A - CONTAMINATED LAND MEASURES – ASSESSMENT*

*PC14B - CONTAMINATED LAND MEASURES – REMEDIATION & VERIFICATION PLAN*

*PC14C - CONTAMINATED LAND MEASURES - REMEDIATION & VERIFICATION*

*PC14D - CONTAMINATED LAND MEASURES – UNFORESEEN CONTAMINATION*

*PC15A - IMPORTED SOIL*

*PC15B - IMPORTED AGGREGATES*

*PC15C - USE OF SITE WON MATERIALS*

*and*

*R4 CONTAMINATION AND UNSTABLE LAND INFORMATIVE*

#### **5.5 Harbour Authority**

No Comments Received

#### **5.6 Building Control**

An application for Building Regulations approval will be necessary.

#### **5.7 School Services**

No Comments received

#### **5.8 Economic Development**

No comments received

## 5.9 **Waste Manager**

The proposed waste strategy as documented in 5.4 page 52 of the design and access statement has been noted and is acceptable.

Waste management have no observations or objections to the proposed development.

## 6. **EXTERNAL CONSULTATIONS**

### 6.1 **Wales and West Utilities**

Have provided a response confirming the likely location of gas apparatus and pipelines in and around the site, together with advisory safe working practices and site visit /inspection protocols.

This has been passed to the agent.

### 6.2 **Natural Resources Wales**

We have significant concerns with the proposed development as submitted. We recommend you should only grant planning permission if you attach the following conditions to the permission. Otherwise, we would object to this planning application.

Conditions 1-4: Land potentially affected by Contamination

We note that the site may have undergone remediation during any reclamation and decommissioning works since the closure of the docks in the 1970s, but the potential for land contamination to be present following the previous land uses is still high. We therefore request the following suite of conditions to be imposed on any planning permission granted for the site.

#### Condition 1

Prior to the commencement of the development approved by this planning permission (or such other date or stage in the development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

1. A preliminary risk assessment which has identified;
  - a. all previous uses;
  - b. potential contaminants associated with those uses;
  - c. a conceptual model of the site indicating sources, pathways and receptors;
  - d. potentially unacceptable risks arising from contamination at the site.
  
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including

those off site.

3. The results of the site investigation and detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

Reason : Natural Resources Wales considers that the controlled waters at this site are of high environmental sensitivity and contamination is known/strongly suspected at the site from the previous use of the site.

#### Condition 2

Prior to [commencement of development]/ [occupation of any part of the permitted development], a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, and for the reporting of this to the local planning authority. The long-term monitoring and maintenance plan shall be implemented as approved.

Reason : To demonstrate that the remediation criteria relating to controlled waters have been met and (if necessary) to secure longer-term monitoring of groundwater quality. This will ensure that there are no longer remaining unacceptable risks to controlled waters following remediation of the site.

[www.naturalresourceswales.gov.uk](http://www.naturalresourceswales.gov.uk)

[www.cyfoethnaturiolcymru.gov.uk](http://www.cyfoethnaturiolcymru.gov.uk) Page 3 of 6

#### Condition 3

Reports on monitoring, maintenance and any contingency action carried out in accordance with a long-term monitoring and maintenance plan shall be submitted to the local planning authority as set out in that plan. On completion of the monitoring programme a final report demonstrating that all long-term site remediation criteria have been met and documenting the decision to cease monitoring shall be submitted to and approved in writing by the local planning authority.

Reason : To ensure that longer term remediation criteria relating to controlled waters have been met. This will ensure that there are no longer remaining

unacceptable risks to controlled waters following remediation of the site.

#### Condition 4

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted and obtained written approval from the local planning authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved.

Reason : Given the size/complexity of the site it is considered possible that there may be unidentified areas of contamination at the site that could pose a risk to controlled waters if they are not remediated.

Advice to Applicant

We strongly recommend that developers should:

- Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.
- Refer to WLGA document 'Development of Land Affected by Contamination: A Guide for Developers' (2017) for the type of information that we require to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
- Refer to the groundwater protection pages on Gov.UK <https://www.gov.uk/government/collections/groundwater-protection>
- Refer to British Standard for the Investigation of Potentially Contaminated Sites. Code of Practice (BS10175:2011)

#### Flood Risk

We understand your Authority consider the proposed development is less vulnerable development. Please note, if this is not the case, we would wish to be reconsulted.

Our Flood Risk Map, which is updated on a quarterly basis, confirms the site to be partially within Zone C2 of the Development Advice Map (DAM) contained in TAN15 and partially within the 1% (1 in 100 year) / 0.5% (1 in 200 year) and the 0.1% (1 in 1000 year) annual probability fluvial / tidal flood outlines.

Section 6 of TAN15 requires the Local Planning Authority to determine whether the development at this location is justified. Therefore, we refer you to the tests set out in section 6.2 of TAN15. If you consider the proposal meets the tests set out in criteria (i) to (iii), then the final test (iv) is for the applicant to demonstrate through the submission of an FCA that the potential consequences of flooding can be managed to an acceptable level.

The FCA submitted (Cambria Constructive Thinking, Flood Consequence

Assessment (FCA), Museum of Military Medicine, Cardiff, dated October 2019) confirms that the site ranges in elevation levels from 8.39 – 9.30m AOD, with the FFL of the proposed building at 9.24m AOD.

Due to the site levels, the development is predicted to be flood free during both the 1% plus climate change and 0.1% fluvial flood events.

We consider the risk of tidal flooding to the proposed development is negligible, as the site benefits from the presence of the Cardiff Bay Barrage. This operates in a flood risk capacity, providing significant protection to Cardiff from tidal flood risk.

In consideration of the above, we have no concerns regarding flood risk in this instance.

#### Further Advice

The FCA shows that access and evacuation is available along Harbour Drive then to the north west, providing clear access to the wider area road network.

It is for your Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN15. We cannot advise you on matters such as emergency plans, procedures and measures to address structural damage that may result from flooding. Please note, we do not normally comment on or grant the adequacy of flood emergency response plans and procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement during a flood emergency would be limited to delivering flood warnings to occupants/users.

#### Protected Species

We have reviewed the submitted ecology report by Ecological Services Ltd, 'Preliminary Ecological Assessment, Project: Land off Harbour Drive, Cardiff Bay, dated October 2019'.

We are satisfied with the conclusions and recommendation within the report and have no further comment to make in relation to protected species.

#### Other Matters

Our comments above only relate specifically to matters included on our checklist, Development Planning Advisory Service: Consultation Topics (September 2018), which is published on our website. We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests, including environmental interests of local importance.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our website for further details.

## Advice for the Developer

The treatment and disposal of contaminated soils and groundwater is regulated by waste legislation and requires an environmental permit.

Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on site operations are clear. If in doubt, the Natural Resources Wales should be contacted for advice at an early stage to avoid any delays.

Natural Resources Wales recommends that developers should refer to our:

- Position statement on the Definition of Waste: Development Industry Code of Practice and;
  - website at [www.naturalresourceswales.gov.uk](http://www.naturalresourceswales.gov.uk) for further guidance.
- Contaminated soil that is excavated, recovered or disposed of, is controlled waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:
- Duty of Care Regulations 1991
  - Hazardous Waste (England and Wales) Regulations 2005
  - Environmental Permitting (England and Wales) Regulations 2010

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed off site operations is clear. If in doubt, the Natural Resources Wales should be contacted for advice at an early stage to avoid any delays.

If you have any queries on the above, please do not hesitate to contact us.

### 6.3 Council for British Archaeology

We would like to register our objection to this proposal due to the adverse impact on the significance of the Grade II Listed Building, Locky's Cottage. Please see response to application 19/02508/MNR.

### 6.4 South Wales Police

Thank you for facilitating the contact with the developers in respect to the above.

We can now confirm that we have had pre consultation meeting in relation to the design and layout and community safety issues. We have emphasized to the developers the importance of addressing community and crowded places

issues in this increasing popular area of Cardiff. We are aware that the developers have subsequently indicate to yourselves that the development will be built to secure by design standards and will incorporate the features discussed during our meeting. From this point of view South Wales Police welcome this commitment and do not have any objections to the proposal. However, the commitment does not go into great detail and the features listed below are not included in the design and access statement. South Wales Police would ask that Cardiff City Council in considering this application would include the Police recommendation where appropriate as conditions of the development in line with their joint statutory obligations under the Crime and Disorder Act.

The features and conditions we refer to are as follows:

1. A detailed scheme of work is submitted for approval by the council for appropriate methods of separating vehicle/ pedestrian separation methods in the area of the proposed development e.g. a mix of street furniture/ bollards/ planters/gradients in soil levels to prevent vehicle impingement into the building and / or event space outside.  
Reason: To ensure adequate protection measures are in place and safety and protection of all using the facilities
2. The proposed development will be used for recreational, conferences, public events including in hours of darkness. For this reason a scheme of lighting will need to be produced for this development and a LUX PLAN agreed by the local authority.  
Reason: To ensure persons visiting/ working in the area feel safe, particularly at night.
3. A scheme of work for a CCTV system that covers inside and out of the building and the green open events space adjacent to the development. This should be monitored. There should be recording facilities that retain images for more than 30 days. The quality should be of an evidential standard imagery of both day/night images. The system should be designed so that it could be monitored out of public view.  
Reason: To provide reassurance, safety and protection for those using/ visiting the site.
4. There should be a scheme of work for access control for the building that directs visitors in through the main entrance and allows access to public areas only and prevents them from entering any restricted areas of the building.  
Reason: To safeguard those using the facilities and prevent crime.
5. Submit a scheme of works that includes an install a Public address system that can be activated from the reception area to alert members of public/staff should the building have to be evacuated or placed in lockdown.  
Reason: For clear instructions to be given should people using the premises need to be evacuated or evacuated at times of lockdown
6. Material and construction schedule of works to be submitted to the authority for approval e.g. laminated glass.  
Reason: To enhance the safety and security of those using the building and visiting the area reducing fragmentation and progression into the



- building.
7. We aware that this proposed development will be utilised by multiple users and from other organisations. South Wales Police would recommended that there is a detailed Management plan implemented which details the roles and responsibilities as security, monitoring CCTV, control of events, supervision of areas of the building, who takes charge of evacuation and waste disposal from bins.  
Reason: To enhance the safety and security of those using the building and visiting the area.
  8. Ensure that adequate risk assessments are in place in respect of fire prevention, detection Invacuation (lockdown) and evacuation.  
Reason: To Preserve life/prevent damage.

South Wales Police are keen to work with both the developers and the council to ensure high level of safety and security and the success of the above proposal.

Secured by design can reduce crime by up to 75 %. More information about this can be found at [securedbydesign.com](http://securedbydesign.com)

## 6.5 **Welsh Water Dwr Cymru**

We refer to your planning consultation relating to the above site, and we can provide the following comments in respect to the proposed development.

In respect of the aforementioned planning application, we can confirm that Dwr Cymru Welsh Water have been previously informed of the proposed development and consulted, as a 'Specialist Consultee', in accordance with Schedule 1C Article 2D of the Town & Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016. We note that our consultation response has been acknowledged within the accompanying Pre-Application Consultation (PAC) Report, prepared by Scott Brownrigg, which highlights that foul water flows only from the proposed development can be accommodated within the public sewerage system.

Accordingly, if you are minded to grant Planning Consent for the above development, we would request that the following Condition and Advisory Notes are included within the consent to ensure no detriment to existing residents or the environment and to Dwr Cymru Welsh Water's assets:

### Condition

Only foul water from the development site shall be allowed discharge to the public sewerage system and this discharge shall be made between manhole reference number ST19744201 and ST19743201 as indicated on the extract of the Sewerage Network Plan attached to this decision notice.

Reason: To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment.

## Advisory Notes

The applicant may need to apply to Dwr Cymru / Welsh Water for any connection to the public sewer under S106 of the Water Industry Act 1991. If the connection to the public sewer network is either via a lateral drain (i.e. a drain which extends beyond the connecting property boundary) or via a new sewer (i.e. serves more than one property), it is now a mandatory requirement to first enter into a Section 104 Adoption Agreement (Water Industry Act 1991). The design of the sewers and lateral drains must also conform to the Welsh Ministers Standards for Gravity Foul Sewers and Lateral Drains, and conform with the publication "Sewers for Adoption"- 7th Edition. Further information can be obtained via the Developer Services pages of [www.dwrcymru.com](http://www.dwrcymru.com).

The applicant is also advised that some public sewers and lateral drains may not be recorded on our maps of public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect the proposal. In order to assist us in dealing with the proposal the applicant may contact Dwr Cymru Welsh Water to establish the location and status of the apparatus. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

Our response is based on the information provided by your application. Should the proposal alter during the course of the application process we kindly request that we are re-consulted and reserve the right to make new representation.

If you have any queries please contact the undersigned on 0800 917 2652 or via email at [developer.services@dwrcymru.com](mailto:developer.services@dwrcymru.com)

Please quote our reference number in all communications and correspondence.

### 6.6 **Glamorgan and Gwent Archaeological Trust**

The proposal will require mitigation.

You may recall that we have commented on the pre-planning for the development, which includes the removal of this building to another location, within the development boundary, and on the application 19/02598. We have consulted the information in the Historic Environment Record curated by this Trust, which details that there are both designated and non-designated historic assets within the area of the proposed development. The area is part of the Roath Dock and Basin, which was constructed from 1874 onwards, on land reclaimed from the sea. 19th century historic mapping shows the area as sea, the First Edition OS map shows the Basin, sea wall and graving docks. There are four Listed Buildings within or adjoining the site relate to the maritime use,

of which Locky's Cottage (Cadw ref. 14060) is one, the others being: the Sloping Stone Sea Wall (Cade ref. 14058), the Former H.M. Customs and Excise Office (Cadw ref. 14059), and the Dock Walls of Roath Basin (Cadw ref. 14062). Apart from the cottage, there will be no significant effect on any of these structures.

There is the potential that enabling works and groundworks during the construction phase may encounter archaeological deposits, particularly those associated with the creation of the Basin and associated dockside features such as tramways, sheds and other structures or buildings. It has been our experience that such features when described as demolished or cleared leave remains, and the likelihood of these being encountered can be mitigated by condition. It is unlikely that more deeply buried deposits relating to the tidal muds and other organic deposits would be encountered.

Regarding the Cottage, historic building recording can mitigate the impact on the removal of the cottage, by recording it within its current setting.

We recommend a condition requiring the applicant to submit a detailed written scheme of investigation for the implementation of a programme of archaeological work, to mitigate the impact of the development.

We envisage that this programme of work would take the form of a watching brief during ground disturbance works, to include but not be limited to, geotechnical and preparatory works, foundations, services and landscaping. It will also include provision for the recording of the cottage, to Level 3 within Historic England's Guide to Good Recording Practice, 2016. The written scheme would include detailed contingency arrangements including the provision of sufficient time and resources to ensure that any archaeological features or finds that are located are properly investigated and recorded; it should include provision for any sampling that may prove necessary, post-excavation recording and assessment and reporting and possible publication of the results. To ensure adherence to the recommendations the suggested condition should be worded as model condition 24 given in Welsh Government Circular 016/2014

*No development shall take place until the applicant, or their agents or successors in title, has secured agreement for a written scheme of historic environment mitigation which has been submitted by the applicant and approved by the local planning authority. Thereafter, the programme of work will be fully carried out in accordance with the requirements and standards of the written scheme.*

*Reason: To identify and record any features of archaeological interest discovered during the works, in order to mitigate the impact of the works on the archaeological resource.*

It is our Policy to recommend that all archaeological work must be undertaken to the appropriate Standard and Guidance set by Chartered Institute for Archaeologists (CIfA), <https://www.archaeologists.net/codes/cifa>) and that it is carried out either by a CIfA Registered Organisation or an accredited MCIfA

Member (<https://www.archaeologists.net/regulation/organisations>).

If you have any questions or require further advice on this matter please do not hesitate to contact us.

## 6.7 **Cardiff Civic Society**

19/02506/MJR

\*The construction of the Museum of Military Medicine will result in a loss of green space in an area of the city where very little green space exists. The claim that a relatively small area would be lost is unjustifiable. The Butetown ward is identified as having a deficiency of open space. At a time when obesity is a huge problem, causing more cancer than smoking, eroding any green space cannot be justified. Furthermore, Cardiff Council has a legal obligation to provide open space.

The above application, if approved, would result in an unacceptable loss of open space.

Planning application documentation dating back to the early 1990s exists, proving categorically that these areas were designated as public open space. Indeed, the provision of these open spaces was the premise upon which planning permission was granted for the redevelopment of Cardiff Bay.

The open space provided by Britannia Park in its current form provides an invaluable open, recreational area where children can play – a vital resource in a part of Cardiff where apartments without gardens predominate. Exercise is vital for the health and well-being of children, and indeed, the population as a whole, as outlined in the Welsh Government's Well-Being of Future Generations (Wales) Act 2015.

The loss of trees, when Cardiff Council has declared a Climate Emergency, cannot be justified. Trees are our frontline defence against the effects of a warming climate, and we should be preserving our mature green infrastructure not compromising it for the sake of an ill-considered development.

\*The proposed development site is in close proximity to an EU designated site (SAC, SPA RAMSAR sites). A Habitats Regulation Assessment ("HRA") is required by law. Failure to carry out such an assessment indicates that the applicant has failed to comply with EU law to protect coastal/estuary wetlands. furthermore, it is the duty of the Council as competent authority under the EU legislation to comply with this legal requirements).

\*There has been no provision made for public transport or parking for visitors – according to the applicant, some 225,000 per year.

\*The structure of the building is inappropriate to the location. At five storeys high, it will overshadow both what remains of the park, and the Norwegian Church.

19/02508/MNR (Application for Listed Building Consent)

\*The Grade 2 listed Locky's Cottage should remain in its current location where it has context and significance. The only justifiable reason for relocating an historic building is to preserve it. Relocating it to make way for development is deeply inappropriate.

Relocation of Locky's Cottage would affect its character as a building of historic interest. It is a common misunderstanding that the special interest of a listed building lies only in its features, this interest extends also to its history and context. British Listed Buildings describes Locky's Cottage as 'an interesting survival from the port and for group value with Roath Basin sea lock'. Removed from Roath Basin, its historic significance would be lost. For the above reasons, both these applications should be refused.

## 7. **REPRESENTATIONS**

- 7.1 The proposals have been advertised by a combination of neighbour letter, multiple site notices, and press notice.

Amended Plans/Additional Information have been advertised similarly.

### 7.2 **Local Members**

Councilor Saeed Ebrahim objects to the proposals ...

"I am acting on behalf of the residents of the Butetown ward and objecting to this application as the local Ward Councillor for the following reasons:

#### **Loss of open green space.**

Local residents are concerned about the impact on Britannia Park as well as the loss of grassed area and trees, the large building will dominate the park and overshadow what is left. The children's play area would be affected. It is unnecessary to build over the park when there is empty public wasteland nearby.

#### **Transport and parking.**

The application makes no provision for this, simply assuming that existing transport links and parking spaces will suffice. This is despite claiming up to 225,000 expected visitors a year, which could mean a few thousand on peak days. There is already a shortage of public parking spaces in the area.

#### **Visual impact.**

At 5 storeys high, the building will tower over the Norwegian Church, providing an unsightly background for iconic views across the Bay that are used to promote our City

### 7.3 **Neighbours**

- 7.3.1 A "***Resident petition to Cardiff Council to save Britannia Park***" was received in March 2020. [81 signatures >50 in Cardiff]

A further petition of objection was presented to Full Council by Councillor Rodney Berman on 26<sup>th</sup> November 2020. [246 signatures >50 in Cardiff]

7.3.2 3 comments of support have been received including that of the Chief Executive of the Cardiff and Vale Health Board. The 130<sup>th</sup> (St John) field ambulance research group; and Dr W Williams (GP).

Reasons for support for the Development are :

- Access and understanding of the consequent leaps in medical knowledge which warfare has brought about.
- Retains the major green space
- Relevant to very many welsh soldiers / Cited Welsh Linkages
- Offers a more balanced approach to Military history and consequences of war
- Includes for continued research and development
- Fascinating , stimulating, educational and Viable
- Clinical and Academic support from Local Health Board

7.3.3 36 comments of objection have been received based principally on the following grounds:

- The precedent of past planning decisions from the initial creation of the park as a valuable open space through subsequent decisions that it should be kept as such.
- The loss of green open space in a ward and local area that has a deficiency in this, in breach of LDP Policy C4.
- The scale and dominance of the proposed building on the site which will reduce the leisure amenity of the remaining green space and the visual amenity of existing vistas.
- The extra demand this new attraction will place on local transport and parking facilities, with no provision for disabled parking.
- The design and appearance / inappropriate for a park and in context of heritage features.
- The Development is Contrary to Climate Emergency Declaration
- The Development is Contrary to the health and wellbeing of future generations Act
- Against Listed Building Policies.

7.3.4 Copies of Representations are appended as an annex to this report.

## 8. **ANALYSIS**

### **Environmental Impact Assessment**

8.1 The proposal has been screened against criteria and thresholds provided within the Environmental Impact Assessment (Wales) Regulations 2019 and is concluded not to comprise 'EIA Development' and not to require the submission of an Environmental Statement to allow the Local Planning

Authority to determine a planning application.

### **Key issues**

- 8.2 The key issues relate to the suitability of the location in terms of Land Use, the impact on Britannia Park including loss of open space; access and impact on transport networks; design; and impact on heritage assets.

### **The suitability of the location in terms of Land Use**

#### The Site Location

- 8.3 The proposal is for the construction of a museum (Use Class D1 – Non Residential Institutions) on approximately 2670sq m of land at Britannia Park off Harbour Drive. The submitted Design and Access Statement suggests that the development will comprise exhibition, library and archive space; business floorspace; a café, retail space, and associated landscaping.
- 8.4 The application site boundary is irregular but is approximated at some 30m x 90m with its longer edge approximately 6m from the outer lock edge of the Roath basin, and allowing for a margin around the building which is approximately 24m x 70m. The site is wider to the south end of the park to encompass the children's play area from which the building would remove some 130m<sup>2</sup> of land as a linear strip.
- 8.5 The application site also includes for a small rectangle of land corresponding with the footprint of the lock keepers cottage which is proposed to be relocated to an area to the SE of the Waterguard Public House.

The park is in Council Ownership.

#### Land Use

- 8.6 The site is located within the Bay Business Area (BBA) as defined by the adopted Cardiff Local Development Plan 2006-2026.
- 8.7 Policy KP10: Central and Bay Business Areas. identifies the Bay Business Area as a focus for Government, Tourism and Leisure uses and states that future development should continue to enhance the waterfront as an attractive and diverse mixed use location.
- 8.8 KP10 recognizes that new and improved leisure, recreation and tourist facilities are important for the future development of Cardiff and can generate significant benefits to the local economy.
- 8.9 Improved recreation and leisure facilities could potentially make the area a more attractive place in which to live, work and visit and may stimulate further inward investment and regeneration
- 8.10 In principle a proposal for a Museum in this area raises no land use policy

concerns subject to assessment against other policies of the Development Plan.

#### CLIMATE CHANGE/FLOOD RISK

- 8.11 Policy KP15 and EN14 of the LDP seek to ensure development responds to issues of Climate change and to locate development away from where it would be at risk from flooding (including both river, and coastal flooding).
- 8.12 Along with TAN 15 Policy EN14 and KP15 encourages developers to demonstrate that they have considered the potential risk and consequences of flooding and that they have considered the need to incorporate environmentally sympathetic flood risk mitigation measures in their developments where necessary.
- 8.13 The application includes a commentary on flood consequences which confirms that the area is predominantly located in flood zone 'B' as indicated on NRW's Development Advice Maps and that it also benefits from the Cardiff Bay Barrage as a flood defense.
- 8.14 A small central piece of land on the southern side of the site, and the controlled waters around the site are categorized as flood zone C2, and comprise the impounded fresh water river flows into the bay and the salt water marine waters of Roath Basin as fed from the Alexandra Dock and the Bristol Channel and which are separated by the outer lock which is now plugged since the lock gates ceased to function. i.e. both of these water bodies may be subject to extreme weather conditions or high tides but height of water in both bodies are mechanically controlled.
- 8.15 In respect of location, the risk of flooding of the museum is considered extremely low. The base of the building is approximately 9.3m above mean sea level and the level of the bay and regulated by the barrage. The area is also well served in terms of access and egress routes, and as there would be no apparent limitation on the capacity or ability of operators or the public to decide not to open or visit the museum at times of extreme flooding elsewhere, the nature of the use is also concluded to be a less vulnerable use in that it contains no residential accommodation and would be able to manage egress of less able bodied visitors in an extreme event. The risk of flooding also applies to the majority of existing buildings in and around the Bay and Basin. The applicant is also fully aware of the potential risk to building fabric as might be relevant to a building with the slab levels proposed at the stated datum and has seen fit to progress with an application for the development on this site.
- 8.16 Overall the Local Planning Authority conclude that the provision of the museum as a non residential, privately managed, visitor attraction is considered a less vulnerable use, and is justifiable in terms of it's adjacency to a category C2 flood zone.
- 8.17 TAN 15 provided by Welsh Government also encourages the LPA to weigh the merit of the development to against set criteria; these being that :



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

ii. Its location in zone C is necessary to contribute to key employment objectives supported by the local authority, and other key partners, to sustain an existing settlement or region; and

iii. It concurs with the aims of PPW and meets the definition of previously developed land; and

iv. The potential consequences of a flooding event for the particular type of development have been considered.

8.18 The LPA are therefore satisfied that the development would assist in the regeneration of Cardiff Bay, would meet the criteria of development of previously developed 'Brown Field' land, and that the likelihood and consequences of flooding have been properly considered for the characteristic of development proposed.

8.19 It is concluded that the application site is a suitable location for a museum in Land Use terms, subject to satisfactory assessment against other Development Plan Policies.

### **The impact on Britannia Park**

8.20 A large proportion of the objections to the development raised in response to the public consultation cite the loss of Britannia Park and the loss of Greenspace as a principal reason for resisting the proposals. This needs to be assessed, in terms of what is actually proposed and the likely impact on the park, and considered against the policy provisions of the Development Plan. It is clear from submitted plans that the park is not lost, but would be impacted upon by the proposed building and may require some re-arrangement to accommodate it.

8.21 It should also be noted that although the area has been used as open space for many years by grace of the former land owner Associated British Ports, it has only recently been acquired by the Council, who are currently considering how best to improve the quality of the land in terms of its use as a piece of public realm/open space.

8.22 The application site and immediate area is identified as open space in the most recent open space survey. Policy C4 of the LDP which seeks to protect such areas therefore applies; together with approved Supplementary Planning Guidance relating to Green Infrastructure and the Technical Guidance Note relating to Protection and Provision of Open Space in New Developments (November 2017).

- 8.23 Policy C4 seeks to protect open space that has significant functional value (including land that can accommodate formal/or informal recreational uses), has conservation, environmental or amenity value through only allowing proposals where:
- They would not cause or exacerbate a deficiency of open space in accordance with the most recent open space study; and
  - The open space has no significant functional or amenity value; and
  - The open space is of no significant quality; or
  - The developers make satisfactory compensatory provision; and in all cases
  - The open space has no significant nature or historic conservation importance.
- 8.24 This policy reflects national planning policy relating to open space set out in Planning Policy Wales and Technical Advice Note 16 relating to Sport, Recreation and Open Space (January 2009). The policy recognises that it is necessary to consider both the quantity and the quality of the open space when assessing any proposals for development.
- 8.25 It is noted that Britannia Park is very varied in its make up, and includes large areas of hardscape (mainly clay pavior); but also areas such as the area of chippings left over from previous development; areas of shelter planting; public art pieces and the stone workman's hut as well as principal, and secondary grassed areas including enclosed areas such as the children's play area.
- 8.26 The most recent survey of open space (May 2019) places a blanket categorisation on most of the site as 'amenity open space' and the smaller children's play area as 'recreational open space'. As indicated above however, the park is very diverse in its makeup, and it is observed that some areas work more successfully than others.
- 8.27 A number of objections also suggest that any reduction in open space in a ward with a deficiency of Open Space should be resisted in principle. The character, quality and accessibility of open as well as the overall size of open space are important however and material planning considerations.
- 8.28 Most notably the large proportion of the application site (over 700 sq m) which is laid to gravel chippings, reads quite separately from the finished pavior and grassed areas, to the extent that visually it is rather uninviting and unattractive, often avoided and unused. Some temporary uses have occupied the space in the past such as the ferris wheel, however the bulk of the area on which the museum is proposed is considered one of the less successful areas within the open space, left over from when the bay was developing; and after removal of 'the tube' .
- 8.29 It is accepted that the footprint of the building and pathway infrastructure surrounding it does intrude into the current children's play area by approximately 130m<sup>2</sup> as a linear strip, and would also see the loss of some

560m<sup>2</sup> of grass from the existing arrangement of finishes in the park. However it is also suggested to Committee that the development itself might be seen as an opportunity to improve on the current arrangement of open space and might by agreement also provide for more accessible facilities for users and visitors of the remaining space.

- 8.30 A number of objections also cite the proposed loss of trees in the context of the climate emergency as being an unduly negative consequence of the development. Policy EN3 of the LDP addresses landscape protection, including that related to the preservation of trees. The development itself would require the removal of four trees from the application site, comprising two 'C' category, early mature Italian alders, one 'B' category early mature Italian alder and one 'B' category early mature 'New Horizon' elm which the developer would seek to replace elsewhere on the site. Original Plans indicated that x4 new trees would be provided and might illustratively, form a 'colonnade' to the NE frontage of the building. The DAS suggests that the establishment of new trees may also play a beneficial role in achieving a sustainable drainage solution. The Strategic Planning Officer suggests that *Ilex* 'Nellie R. Stephens' or *Ilex aquifolium* 'J.C. Van Tol' would be best suited to perform this role, planted at semi-mature size or as large as possible as this will be tolerant of shade and coastal exposure and has a relatively formal shape and will provide year round shelter. As in all cases, tree pit size, volume and in this case the likely need to import appropriate soils will be critical to the establishment of new trees but should not be insurmountable in the hands of a competent landscape designer.
- 8.31 Further to this, and given the level of objection received in respect of the intrusion of the building into the current play area, concerns over the appropriateness of the current shelterbelt, and long term intentions for the park generally, the developer was also asked to look at the greater area of the park, and consider how the space might continue to provide the greenspace evidently valued by objectors to the proposals, and to see how the children's play area might be enhanced or made safer in respect of separating it from the current shelter belt of trees, and explore new tree planting opportunities which might better serve the public/remaining space in the longer term..
- 8.32 The indicative plan submitted showing the play area moved closer to the Waterguard raised concern in respect of the degree of tree replacement shown, and concerns over maintaining adequate but appropriate shelter to the play area; however the submission of an indicative scheme was considered beneficial in showing that it would be possible to reconfigure the park to retain its key elements of grass and play area as well as the new building if subject to a detailed landscape and microclimate assessment. Although development of a revised landscape will require further work and detailed consideration, the agent has confirmed a willingness to liaise with the Council to ensure the best possible solution in terms of long term planting arrangement including finishes, appropriateness of species choices, and potential to improve user experience of the area by appropriate landscape screening.
- 8.33 It is likely that the Council would liaise and advise the applicant; and may also

potentially undertake any new landscaping works in the park, (as it will be responsible for their future maintenance and repair) as part of wider landscaping and public realm proposals for the area.

- 8.34 In summary, Committee are advised that although it is accepted that the new building would involve a net loss of open space from the park; that the unfettered public access and facilities provided to the ground floor of the museum are considered to satisfy the requirement of 'compensatory' provisions in this instance and that the proposals are satisfactory subject to a further requirement to upgrade and improve the remaining area of public open space ahead of the opening of the museum; which is considered would better serve the public if compared to the retention of the existing landscape; and that this can be appropriately controlled by means of planning condition if the Committee find the development acceptable in all other respects.
- 8.35 The development is therefore considered to be able to accord with the policy intentions of policies C4 and EN3 of the Development Plan and the design of the building considered of sufficient design quality to warrant the loss of the B category trees subject to satisfactory replanting in line with the requirements of the Development Plan Policy/SPG.

#### **Access and impact on transport networks**

- 8.36 The Council's Planning Policies generally promote a modal shift to more sustainable modes of transport and seek to resist development which would cause unacceptable harm to the safe and efficient operation of the highway, public transport and other movement networks. ...
- 8.37 The applicant has submitted an initial, and further transport statements which do not vary significantly in their assessment of the context, available transport options and projections as to the number and nature of trips the museum might generate. These are also supported by the information in the submitted design and access statement.
- 8.38 In summary the statements confirm the area is well served by existing transport infrastructure including major road and rail links to the city centre; is located on the strategic cycle network and is easily accessible by foot.
- 8.39 Based on data from other similarly sized museums and galleries the applicant anticipated (pre pandemic) visitor numbers to the museum of circa 175,000 in 2023 to 225,000 by 2025.
- 8.40 During the week the applicant estimates that there might be some 430 visitors daily, (860 journeys) likely split between 44% arriving by foot ; 25% by bus; 11% by rail; 9% by car share;4% as single person car users; 5% by coach and 0.3% by cycle. On Saturdays, there might be increased patronage to nearly 1000 visitors (2000 journeys) with a greater bias towards car usage (52%); 27% by foot; 19% using public transport and 1% travelling by cycle.
- 8.41 The surveys suggest however that visits to the museum would be likely to form

a supplement to existing visits to Cardiff Bay and these trips would not for the greater part be additional new trips, but would be linked to other journeys and would be accommodated on the existing transport network.

- 8.42 The Council's Transportation Officer concurs and compares with near 11 million visitor trips to Cardiff Bay annual. He raises no concern over the capacity of the Highway network to cope with likely increased demand.

#### Accessibility/Available modes

- 8.43 The site is accessible to pedestrians from Harbour Drive and Britannia Quay, Heol Porth Teigr (Tiger Way) and by a number of footpaths that currently circumnavigate the basin and cross Britannia Park; and by cycle or on foot from the Barrage.
- 8.44 Cardiff Bay has good quality cycle infrastructure. Much of the area is pedestrianized or traffic regulated (such as around the Sennedd and over the origami bridge) , providing a safe, low traffic/traffic-free environment for cyclists. The Cardiff Bay Trail from the Cardiff Bay Barage passes the site. This links to National Cycle Network 8 that offers cycle options to the city centre and further north along the Taff Trail.
- 8.45 There are nearby bus stops outside the Millennium Centre and at Pierhead Street and Bute Street, that are served by the No. 8 X8 and No 6 BendyBus services and generally operate every 12 – 15 minutes.
- 8.46 Cardiff Bay railway station is located approximately 850m/10 minutes' walk from the site. It provides a constant shuttle service between Cardiff Queen Street and Cardiff Bay every 12 minutes.
- 8.47 The main vehicular routes into Cardiff Bay include the A4232 Ely Link from the west and east, the A4119 Penarth Road from Grangetown and A4232 Adam Street Central Link and parallel Lloyd George Avenue and Bute Street linkages from Tyndall Street / the city centre.
- 8.48 Overall the Bay and the application site are considered to be provided with excellent and easy transportation options to accommodate the projected character and numbers of visitors aspired.
- 8.49 The proposed principal access to the building is from the adjacent Harbour Drive. Opposite the Norwegian Church. The Britannia Park elevation of the building also allows for pedestrian access from the park whilst still being able to be adequately observed and managed in terms of any specific operational requirements of the museum and from a security/access control perspective.
- 8.50 No car parking is proposed within the development. This accords with the Council's supplementary planning guidance which seeks to minimize reliance on car based journeys and maximize the use of public transport facilities. There are however a number of surface level and multi storey car parks within close proximity of the site as well as the on street parking bays on Harbour

Drive including a number of disabled spaces near the Norwegian Church.

- 8.51 In respect of operation, deliveries to the Museum for installation of exhibition pieces and display materials for events are suggested to be infrequent and managed outside of peak traffic hours.

Deliveries to the café will be more regular but similarly managed outside of peak traffic hours.

Waste and recycling collections are indicated to be by private collection.

- 8.52 In respect of specific issues raised by objectors, the following commentary is offered.

#### Car Parking /Disabled Car Parking

Objection has been raised in respect of a lack of available car parking.

As a D1 use located in the Central Area Parking zone, current Supplementary Planning Guidance would promote a maximum of 0 car parking spaces for visitors and staff. The design and access statement and transport statement confirms this to be the applicant's intention as promoting use of sustainable modes.

Objectors raise concern over this and have also undertaken a rudimentary analysis of the impacts as might be developed from the estimated visitor numbers indicated in the Transport assessment.

Objectors suggest that if the approximated projection of 225,000 visitors is accurate, and even if the Council's aspired 50:50 modal split is achieved that this would still on average mean that there would be very many additional car based journeys per day.

In the context of the availability of on street pay and display(circa 75 spaces around the basin); multi-storey car parks at Mermaid quay(380 spaces likely soon to be increased), Q Park (1240spaces); and nearby temporary surface level car parks (75spaces) in addition to that of Harbour Drive (70 spaces), County Hall (600 spaces weekends) and Red Dragon (800 spaces) it is concluded that there is more than sufficient capacity in the area to cope with the demand as might be presented by the museum.

Cumulative impact as might arise from further development in the area would need to be assessed at the time of any such proposals, however it is concluded that the museum would not currently adversely impact on transport networks to any material degree.

In respect of disabled car parking spaces there would appear adequate provision of disabled spaces at Britannia Drive; and also noting the Transportation officers comments that blue badge holders can park without having to pay a fee on any public parking space within the Pay and Display facility, it is concluded that no additional

provision is required to be assigned specifically for museum use.

## Cycling

- 8.53 The Councils Adopted SPG/Parking Standards apply and secure cycle parking provision can be required by condition.

The forecourt to the building and back of house areas would appear to offer sufficient capacity to meet staff and visitor cycle parking needs and members will recall approving planning permission for a purpose built cycle store facility at the Mermaid Quay car park a few months ago which will increase capacity in the area generally. The Council will also assess cycle parking needs as part of any revised landscape/public realm scheme for the area.

## Conclusion.

In summary, the traffic projections provided by the applicant are acceptable as a basis to projecting potential traffic impacts; and it is concluded that there are more than adequate transport options and sufficient capacity in the existing transport network to accommodate the projected visitor numbers.

## Design

- 8.54 The building would measure approximately 70m in length, be approximately 24m in width and be approximately between 15.9m and 21.3m tall at its two principal roof heights returning a gross internal area of 4733sqm within a building of 4 and 5 storeys.

The building would be orientated on a SW-NE axis, and would parallel the outer lock crossing of Roath Basin at a distance of circa 6m.

Aesthetically, the building would present two distinctively different visual elements. A fully glazed flat roofed 4 storey element to the SW which would wrap around a higher 5 storey Red Oxide saw-tooth roofed presentation to the NE, and would also present a perforated copper mesh curtain to the glazed element of its SE elevation fronting the lock.

Policy KP5 applies in respect of both the aesthetic and sustainability of the building and its relationship to others. The aesthetic and materials specification of the building has raised comment from the public including those with a particular design or environmental interest.

## Aesthetic.

- 8.55 The use of Glass, Copper and Red Oxide finishes on the exterior of the building, and the use of the saw tooth roof borrowed from other historic docks buildings in the area produces a very bold and striking development.

The building has been conceived as an entity, with its function being highly instrumental in guiding it's scale and form; it is accepted that the same building

has also been proposed in other parts of the City and was not conceived exclusively for this site as indicated by a number of objectors, however comments that the building has a weak relationship with its surroundings are not supported for the reasons stated.

The Aesthetic concept of the development is appreciated as a high quality architectural piece, with very strong and appropriate reference to its context in full accord with Policy KP5 of the Development Plan.

#### Scale, form and Mass

- 8.56 Objections have been received which suggest that the building is overly tall and will be domineering in the local context, but as the illustrative 3D and aerial views submitted by the architect show, the building is significantly lower than many around the basin, including those such as Atradius which form the existing context of the Norwegian Church, and that the proposed building form has been positioned to provide a good separation distance from it, is offset from it, and is tiered with the highest element of the structure furthest away from the church.

Comparatively at 4-5 storeys (15.9m and 21.3m tall) the building is not a particularly high in the context of other buildings in the bay; comparatively the glazed element of the building would be around 900mm higher than the spire of the Norwegian Church at a distance of around 40m, the saw tooth roof section, some 6m higher than the spire of the church at a distance of around 50m is considered appropriately respectful. For reference, the Atradius office building is some 32½m tall at a distance of some 125m. The submitted relative heights drawing also indicates 3 Assembly square at 26½m and Vega House as part of the Celestia development at 47m. At 70m, the building does present a long elevation, both to the park and to the lockside, but this in some ways reflects the form and proportion of the lock, and the elevation is also broken in terms of materials finishes which allows it to read as a series of distinct and smaller elements. This is also useful in shielding the park from winds coming from the docks to the east.

The scale, height and mass of the building is therefore considered acceptable in the given context.

The interior arrangement of the building with open public access to facilities on the ground floor and an internal control point to paid areas of the museum at upper levels is considered very positive and likely to maximize use of the building to the benefit of all. The interior ramp as a means of providing an accessible route within the space, but also conceived as part of the journey between exhibits as a timeline or journey through different topics in displays is considered innovative, and also will allow some quite spectacular views.

Overall it is concluded that the design of the proposed building will form a striking addition to the public space and to the bay area in general whilst also responding sensitively too its local context.



## Overshadowing

- 8.57 A shadow study is included in the design and Access statement which confirms that the building at 4/5 storeys in height and located to the SE of the park will produce a greater overshadowing impact than if the ground remained level.

The impact would obviously not be as significant in summer, but it would have to be accepted that the principal grassed areas would receive a greater shadow cast than existing, albeit moving and having varying degrees of impact throughout the day.

The existing and proposed sun path/shadow fall analysis suggests that the building shadowcast on the principal grassed area of the park would be worst between 12.00 and 16.00 in spring and autumn but would still move sufficiently to allow some sun on that area after 16.00.

As with most buildings in the City, December impacts are small as days are short and shadows from all structures very long. It is observed however that outside of the peak summer months, that use of the grassed area is significantly reduced and that in winter as weather becomes inclement, it is avoided because of issues with mud and damage to the grass.

## Use of Corten Steel

- 8.58 The objections raised (principally environmental concerns) regarding the use of Corten steel in a marine environment and as a construction material generally are noted.

This is however ultimately the decision of the architect who would bear liability for the building. The matter has therefore been referred back to the Architect who has responded by drawing reference to the Design and Access Statement and by citing a number of instances where Corten Steel has been used in marine environment; and further comments that....

'There is plenty of precedents for the use of Corten in a marine environment, the most similar comparison to our situation is Dublin Docks, It has also been used by Haworth Tompkins Architects at Snape Maltings on the Suffolk Coast, and in major public buildings in Melbourne, Fukuoka and Troy on the Turkish Mediterranean Coast'.

It is accepted that there are mixed views and research relating to the aesthetic, sustainability and environmental impacts of Corten, but also observed that similar concerns could be put forward in respect of very many construction and building products and indeed any manufactured product, and use of Corten would not appear to have been restricted by any UK legislation banning use of the product on health and safety or environmental grounds.

As such it will be the architect who would be responsible for the specification, and his insurance which would have to cover any proven liability of defect or environmental consequence.

As is usual, a standard Materials sample condition is attached to the recommendation which would allow for an alternative material if this were considered necessary.

#### Sustainability

- 8.59 The submitted Design and Access statement provides a useful summary of measures which are designed to improve the sustainability of the building, and which are also offered in the context of the Wellbeing of Future Generations Act. These include Showers for staff (Active travel) Easy access thresholds and movement options in the building; transparency of ground floor elevations to promote passive surveillance and safety; use of smart and interactive technologies; Bi-lingual signage; maximization of natural light; Sustainable Drainage; Promotion of Biodiversity through support of new planting and landscaping works; Low and Zero carbon technologies for heating and cooling; water efficient fittings, water meters, leak detectors, and use of recycled water; maximization of natural ventilation and cooling.

All such measures are welcomed and accord with planning policies relating to sustainable design and best use of available resources including policies KP5 Good quality and sustainable design; KP18 Natural Resources; EN10 Water sensitive design; and EN11 Protection of water resources; and EN12 (Renewable energy and low carbon technologies).

#### Drainage.

- 8.60 At present, apart from the area of chippings, and areas of soft landscape, most surface water in the area drains either directly into the bay or basin, or indirectly there by means of buried pipework / sewers.

However as a structure over 100m<sup>2</sup> in area, the building will need to obtain approval from the Local Authority as the Sustainable Drainage Approving Body (SAB Approval) . As such the applicant has submitted a statement as to how it is envisaged that the development will address the key principles of Sustainable Drainage (SuDS) and the developer is currently in discussion with the Council's drainage officers as to how this may be achieved by landscaping and other features. No adverse commentary has been received from the Drainage Officer in respect of the proposals which look to be viable as a favorable drainage solution.

#### Public Art

- 8.61 There are some dockside features and pieces of public art located within the public realm of the site /surrounding area including one of the Beastie Benches by Gwen Heaney (1994). There would be an expectation that this would be retained as part of the proposed development and incorporated into the

adjacent open space and this can be secured by condition.

#### Community Safety/Creating Safe Environments

- 8.62 Policy C3 of the LDP relates to Community Safety and Creating Safe Environments.

It requires that all new development proposals should be designed to promote a safe and secure environment and minimise the opportunity for crime.

The policy makes specific reference to maximization of opportunities for natural surveillance of areas, such as publicly accessible open space; entrances that provide convenient movement without compromising security; good distinction between public and private spaces; and good lighting.

The comments of South Wales Police, who have met with the applicant's agents have commented on this application and a dialogue which promotes a secured by design accreditation of the development is ongoing. The applicant is not resistant to this and is working with the Police to provide a building of appropriate standards and design.

The majority of conditions requested by South Wales Police would seem appropriate and those which would fall outside of land use planning controls are can be included as advisory recommendations/notifications. Where appropriate, the requests are supported by conditions within the recommendation of this report.

South Wales Police have also requested involvement in the development of any related landscaping of the site and of the area generally and the Council is happy to accommodate this.

#### Air, Noise, Light Pollution and Land Contamination

- 8.63 Policy EN13 of the LDP relates to Air, Noise, Light Pollution and Land Contamination

The policy seeks to resist development that would cause an unacceptable loss of amenity or which would be subject to unacceptable levels of land contamination.

The development is considered unlikely to have any adverse impact on air quality. If the café facility is to involve cooking on the premises then mechanical extraction and deodorization of kitchen fumes can be required by condition. The area is not subject to heavy passing traffic and there are no concerns regarding existing air quality in this area.

Further to construction, it is also considered unlikely that the museum would generate any undue noise. The pollution control officer's comments in respect of the control of opening hours, and delivery times, are therefore concluded to be unreasonable and unnecessary, especially in the context of the nearby

operational port.

Similarly the request for a condition to preclude noise for any night time activities at the boundary of residential properties would seem excessive, If for any reason the museum wished to open during the night and were to cause a statutory noise nuisance then the pollution control officer would have other regulatory powers outside of planning to deal with any offence. The site is also some distance away from any residential properties.

The design of the museum does contain a large element of glazing, also orientated to the bay and it is conceivable that if high levels of illumination were allowed throughout the night, then this may cause a nuisance to residents on the opposite side of the bay or be unwelcomed in longer views. As this is the case a condition requiring details of a lighting scheme including intensity and hours of operation is considered prudent. Low level night-time lighting would however be encouraged in promoting neighbourhood safety.

In respect of contamination, past experience has shown that the former operational docks do contain undesirable levels of contamination both in terms of the nature of fill and in respect of deposits from former uses. The request of the contaminated land officer for a suite of conditions to investigate and address any contamination encountered is supported.

The similar suite of conditions requested by Natural Resources Wales with regard to the protection of controlled waters is also supported.

The development is therefore considered acceptable in the context of the aims of Policy EN13 of the Development Plan.

#### Provision for Waste Management Facilities in Development

##### 8.64 LDP Policy W2 applies.

Waste collection is proposed outside of opening hours from a presentation point directly off the Harbour Drive. Waste and recycling collection will be organised through a commercial contract. This is acceptable and in accord with advice contained in the Waste Collection and Storage Facilities SPG.

The waste manager is accepting of the waste management proposals for the museum and raises no objection.

The development is therefore considered acceptable in the context of the aims of Policy W2 of the Development Plan.

#### **Impact on heritage assets.**

##### 8.65 Policies KP17: Built Heritage and EN9: Conservation of the Historic Environment, set out the Council's position in respect of the protection and management of its designated Historic Assets .

The positioning of the Museum in this location will require the relocation of a statutory Grade II Listed Building; will impact on the setting of Waterguard Public House (Also Grade II Listed); would be visible from two Conservation Areas, and would also be located opposite the Norwegian Church which is a recognized local landmark.

It should be noted that neither Listed Building or Conservation area status preclude Development or change; but that there is a statutory duty placed on Local Planning Authorities to have 'special regard' to the desirability of preserving any Listed Building and its setting, and any features of architectural and historic interest it possesses, and also to the preservation and enhancement of the character and appearance of designated areas .

Lock keeper's cottage

- 8.66 It is observed that the proposals do not involve the loss of a listed building in the sense of its destruction and removal; but rathermore to involve its re-siting.

The Heritage Impact Statement (HIA) submitted with this application and which also supports the application for Listed Building Consent, reminds us that the proposal to move the Listed dock workers' building is not the first of its type, nor the first in the area; and that historically, the Waterguard Public House was moved to accommodate a proposed road re-alignment; and that the Norwegian Church was also relocated at a time when its loss from another dockside location was feared. i.e. there is precedent for such works.

The submitted HIA suggests that this particular workman's hut was more likely connected to the former swing bridge which was positioned centrally on the Lock rather than being associated with any lock keeping activities, but this would not impact on the Local Planning Authority's 'general duties' .

It is also noted that the proposals have now been amended in that the agent has confirmed that the proposals will now allow for the re-erection of the building in entirety (as opposed to modifying its interior as part of the move which was the original proposal) .

On this basis the proposal is considered acceptable in respect of addressing the LPA's statutory duty to preserve the building and its special architectural features.

It is acknowledged that the setting of the building would change, but it would still be close to the water, and in the same immediate surroundings as that in which it exists currently, and would retain a sufficient connection to the docks and lock to allow a continued association.

It is suggested that the movement of the building might in itself draw an added interest in it and offer opportunities for its history and purpose to be displayed as part of any new use.

It is also noted that a similar building on the opposite side of the lock which has

been restored as part of the Roath Basin South development, and which was connected with lock opening activities and which is now in viable use; and offers some comfort that this type of dockside building has been appropriately preserved in its original location elsewhere.

The proposal to move the workmans' hut is therefore considered acceptable in the context of the loss of the former swing bridge, that the relocation of the building to the SE of the Waterguard Public House would not unduly detract from its architectural and historic interest in terms of setting or its context or association with its former use.

The proposal to re-site the workmans' hut to the opposite side of the greenspace is therefore considered acceptable in the context of the aims of Policies KP17 and EN9 of the Development Plan.

Impact on the setting of Existing Listed Buildings.

- 8.67 The relocated lock keepers cottage, and the Museum itself would impact on the setting of the Listed Waterguard Public House, However that building itself has been moved, and substantially extended with a modern and contrasting extension in the direction of the park. This being the case it is not considered that the relocated cottage or the Museum would detract from the special interest of the Waterguard.

Impact on the setting of the Norwegian Church

- 8.68 The Norwegian church has no statutory or local protective designation. It is however a prominent local landmark and it is considered appropriate to consider it as a building of interest that positively contributes to the distinctiveness of the city.

Because of concerns expressed by some interested parties in understanding the relative and actual heights and relationship of the museum to the surrounding buildings, The applicant was asked to submit a further drawing to clarify matters.

This drawing shows that the museum's 4 storey glazed presentation would be located approximately 40m from the Norwegian Church, and would be approximately 900mm higher than the spire of the church if compared from Harbour Drive.

Although positioned closer to the Norwegian church than surrounding buildings, this is considered a sufficient degree of separation to maintain a setting to the Norwegian church, and also to allow the two buildings to retain and benefit from their own distinctiveness. In response to comments regarding the new building being oppressive and dwarfing the church, these views are not concurred with, especially given the relationship of the nearby Attradius building which is a much larger structure than the museum or indeed the backdrop of buildings such as the Celestia Apartments and St. Davids hotel which provide much larger visual mass in longer views.

It is concluded that the relationship of the museum with the Norwegian church as a recognized landmark feature is acceptable.

#### Conservation Areas

8.69 The application site is not in a Conservation Area.

The Museum would be located some 140m away from the Senedd end of the Pierhead Conservaton Area and is not thought to impact on that area given intervening structures. The Graving Docks located in the same conservation area would be some 300m away, and again the museum is considered too far distant to impact on that area.

The museum would provide a backdrop to the Norwegian Church as vied from graving dock 3, but at a distance of approximately 385m this is not considered objectionable. This impact would also diminish the closer the viewing point moved toward Graving Dock 1.

Views of the Museum from the Windsor Esplanade Conservation area would effectively be blocked by the St Davids Hotel.

The Museum is therefore considered to be acceptable in terms of its impact on the nearby conservation areas and in terms of impact of views into and from them.

#### Archaeology/Building recording

8.70 The submitted design and access statement suggests that there is only a likelihood of uncovering low or no value deposits during groundworks

The comments of the Glamorgan and Gwent Archaeological Trust which recommend the requirement for an archaeological watching brief and a level 3 recording of the workman's cottage before moving are noted; as is the absolute objection of the Council for British Archaeology to moving the workman's cottage.

It is observed that the site is not in an archaeologically sensitive area, but is of interest in respect of the unknown nature of fill used to complete the dock, and that a watching brief would be beneficial in understanding the makeup of the structure and in potentially revealing artefacts of the period. The mitigation of the impact of moving the workman's hut would therefore seem best approached by means of an appropriate recording exercise as opposed to an absolute resistance.

As such an archaeological watching brief condition, and building recording condition are recommended. Similarly the methodology of deconstructing the lock keepers cottage and to ensure its timely rebuilding can all be encompassed within a heritage mitigation condition.

## **Other issues raised by objectors**

### **8.71 *The land enjoys a protected status as Open Space?***

The area and use of Britannia Park as open space is derived from its inclusion in a masterplan for the north side of Roath Basin and Cardiff Bay known as the Capital Waterside Development which dates back to Outline Planning Permission 90/00479/R when the land along with an area between the pierhead building and the Norwegian Church known as Waterside Park were identified as open spaces for the development of some 75,000 sq m of mixed use office, hotel, residential, shopping and infrastructure works. From this some objectors are of an opinion, and others keen to establish, whether the inclusion of the land in the original masterplan for the area in some way provides it with a protection from future change. The summary response to this question is that it does not. Times and circumstances change, as evidenced by the fact that other elements of that same masterplan were not developed as originally intended, That the area of the Senedd and Millenium Centre may have been developed as a shopping centre or hotel or an opera house at different periods in the last 30 years. It is also evident that land use allocations, and policies change over time. The current LDP does not vary hugely from the former Local Plan or abandoned UDP, but there are changes in both policy content and policy aspirations in the plan which properly change in response to changing environmental concerns and the changing make up of the City, its residents, and employment base and economy.

Britannia park's status as a piece of open space is therefore recognised in the most recent open space survey, and the merit of any proposals for it considered against policy C4 of the Adopted Local Development Plan, but its inclusion in the original masterplan for the area, does not in itself provide any protected status.

#### *Past Planning Decisions.*

### **8.72** Objectors note a history of planning applications and development proposals for the site which have either been refused, quashed, or withdrawn prior to decision on the basis of the protection of open space. These are acknowledged as forming the planning history of the site, but cover a variety of proposals, each of which was properly considered on its merit against extant planning policies of the time.

It is accepted that the planning policy position which seeks to protect areas of open space has not changed fundamentally since the time of past decisions (not all of which were unfavorable) however context, land ownership position, and development aspirations for the area are not static.

Past planning history although a material consideration does not preclude the ability of planning committee to make alternative decisions for an alternative appropriate development of the land.



### *Viability*

- 8.73 Concern has been raised as to the viability of the project, including issues of how it is funded, whether public monies are involved, and as to what might happen if the museum is not a success and has to close.

Planning Committee are advised that issues of viability, funding sources, the business choices of the Applicant, or indeed the decision of other areas of the Council as to whether to support the proposals or not, are not material planning considerations.

However public concerns are noted and it is accepted, that the public interest would not be best served should the project falter at a point during construction; or if following construction the museum might become vacant for any reason.

However these are not matters for Planning Committee.

### *A strategic application?*

- 8.74 Some objections have suggested that these proposals are simply strategic in seeking to establish acceptance of the principle of development on the site, which might favour an application for a larger or an alternative development in the future.

The Planning Committee can only consider the merit of any proposals put before it. This proposal has been considered on its merits against current Development Plan Policies and found appropriate to support.

### *Alternative sites are available*

- 8.75 Objectors highlight that planning permission has already been granted for this museum on land at the junction of Lloyd George Avenue and Hemmingway Road and which many consider preferable; also that there are vast areas of undeveloped land in Cardiff Bay at Porth Teigr and also at Alexandra head which would be more appropriate and would not involve the loss of Open Space.

Whether there are alternative sites is not a matter for consideration of the Committee.

### *No linkage of theme to the City*

- 8.76 A number of objectors have commented that Cardiff has no themed association with a Museum of Military Medicine.

These issues are not material to the determination of the application. It is also noted however that there is some support for the proposal from the Local NHS Health Board.

*Inappropriate theme for a museum adjacent to a public park/children's play park.*

Objectors suggest that a museum with a military or medical theme may be upsetting or unwelcomed by children and their guardians otherwise looking to experience only the amenity of a recreational park.

It is accepted that some children and their responsible carers may be sensitive to the theme of the museum; however, that equally, others may not. It is observed that the proposal is not for a Military Museum in the sense of a War museum, but has been clarified with the applicant to have more of an emphasis on breakthrough sciences and achievements in medicine arrived at through military necessity or innovation. The applicant is keen to point out that a number of the exhibits are children focused and that school party visits are a staple of museum business.

Matters which are material to the determination of a planning application are generally accepted as matters which if considered might result in a different decision or recommendation. They must however relate to the purpose of Planning, and that in itself can be considered against the current backdrop of Planning Legislation and Regulation.

From a land use perspective, it is therefore not considered likely that the theme of a museum would vary the characteristic of its use to the extent that it would be reasonable for the LPA to seek to control it.

*Absence of a Masterplan for the Area.*

- 8.77 Objection is raised because the land has only recently been acquired by the Council (2018) who are still considering masterplanning options for the area; and some objectors consider this application premature until such a masterplan is approved.

It should be noted that the Planning Committee are not being asked to make a decision in the context of a policy vacuum or in between plans, as the Cardiff Local Development Plan is of fully adopted status. Determination of this proposal, and indeed any future masterplan for the area will have to address and conform to the policies of the LDP.

*Microclimate and wind effects not yet examined*

- 8.78 The area is windy, often cold/inclement outside of summer, and impacted upon by the shape of the bay, the barrage, the scale of dockside buildings, wind direction and landscaping. However it is not considered necessary or reasonable to require a microclimate study for a building of only 4 to 5 storeys in the context of taller adjacent development. A microclimate study may inform a future landscaping scheme for the park, but is not considered necessary ahead of the determination of this application. Though it would be logical to assume that the building would have a beneficial shielding effect to the park from winds from the South East.

*Potentially adverse affects on other attractions, such as 'Techniquest'.*

- 8.79 As much as Techniquest is a highly regarded contributor to Cardiff Bay and one of the founding attractions of it, Planning Committee are advised that competition between, and popularity between attractions is not a material planning consideration.

If the bay is to develop along the lines of mixed commercial and leisure types of use an increase in the number and variety of attractions will hopefully benefit the area overall as a leisure destination and attract visitors to more than one venue in a day, weekend, or during longer stays in the city. .

*The exact composition of uses within the building.*

- 8.80 Some objectors have queried the exact nature of different components of the use, commenting that press articles have advised that the use would include teaching space and that degree qualifications might be obtainable from studies within the building and that the building might be used as a research facility which might be medically orientated, or as an archiving facility.

It understood that the spaces in the building are designed to be flexible and may allow for very many types of use ancillary to the main function of the display of exhibits.

Committee are advised that Use Class D1 is broad class covering many types of 'Non residential institutions' including teaching facilities, but also, training centres, schools, public halls, libraries, nurseries, creches, clinics and health centres, and although it would be appropriate to preclude some otherwise permitted changes of use between some types of D1 use, they are generally characteristically similar, and this would ordinarily only be done if there were exceptional circumstances or recognised potential conflict in a given context.

For clarity, the use of the building for teaching, research, or archiving uses are not considered objectionable as a component of this proposal or in the context of this mixed use environment

*Britannia Park as a Valuable Open Space*

- 8.81 These matters are covered within the report. It is considered that the proposal will allow for retention and maintenance of the open space whilst increasing its value by providing public facilities

*Britannia Park as a public park*

The land has been used and is designated as open space within the Development Plan and its status as such is a material planning consideration addressed within the report

*Protection is afforded to Britannia Park as open space because of its approval under the original outline planning permission for the area.*

From a planning perspective, the development of any land falls to be considered against the policies of the extant development plan for the area. A previous planning permission or land use allocation does not provide a protected status. Each development proposal is considered on its merits against the policies of the plan and any other material planning factors at any given time. e.g. the whole of the docks area was once allocated for industrial uses; later policies saw a shift to more office based uses as the economy developed a more service sector bias; and most recently the area has been promoted for mixed use including office, leisure and residential.

*The current use should be protected.*

This is not the subject of this report; or a matter to be considered here.

*Planning history as a reason for objection*

Planning history may influence a decision, does not preclude the making of alternative decisions.

*The Design and Access statement makes false and misleading claims*

- 8.82 The Design and Access Statement expresses a number of opinions about which others may take an opposing view, but there would appear no factual inaccuracies within the statement which would impact on the recommendation of this report / analysis of the development proposal.

*Open space in Porth Teigr should not be used to justify loss of open space elsewhere.*

- 8.83 The character, quality and accessibility of other open space in the immediate area as well as the overall size of open space are material planning considerations when considering the impact of development. The presence of the Queens gate roundabout open space, the Outer Lock open space , and general landscape of the area are all acknowledged, but not considered a principal matter in the determination of this application in respect of the impact of the development on Britannia Park.

*Views to and from the Museum*

Views to and from the museum are not considered to adversely impact on privacy or amenity, or to detract unduly from existing landmarks or vistas, as indicated in the report.

*Urban legibility*

The development is considered legible as a public attraction and public facility, and also of an architectural quality which promotes it as a cultural venue.

*Dock wall Access*

An access strip sufficient for ABPs needs is retained in terms of the positioning of development.

8.84 Matters of why Cardiff, The Bay or Britannia Park, have been chosen for this development; A lack of connection with Cardiff Bay; Land Transactions; Choice of sites; Viability; Claimed economic benefits; the Current financial position of the Museum Trust; The Museum's ambitions ; development funding; Site risks and consequences of failure of the project; Alternative sites; Future development of surrounding land; Future of Porth Teigr and Alexandra Head are not matters material to the determination of this planning application.

## 9. **OTHER CONSIDERATIONS**

### 9.1 **The Wellbeing of Future Generations Act (WFGA).**

The Well-being of Future Generations (Wales) Act 2015 places a duty on the Welsh Ministers (and other public bodies) to produce well-being objectives and take reasonable steps to meet those objectives in the context of the principle of sustainable development. The duty to improve the economic, social, environmental and cultural well-being of Wales, in accordance with the sustainable development principle, under section 3 of the Well-Being of Future Generations (Wales) Act 2015 (the WBFG Act), has been considered and account has been taken of the ways of working set out at section 5 of the WBFG Act in the determination of this application, and it is considered that this decision is in accordance with the sustainable development principle through its contribution towards one or more of the well-being objectives referred to in section 9 of the WBFG Act.

The Act seeks to bring together issues of importance to the health and wellbeing of future generations which are not always compatible and sometimes conflicting.

The Act indicates that attention should be paid to all wellbeing goals;

A Globally Responsible Wales; A Resilient Wales; A Healthier Wales; A More Equal Wales; A Wales of Cohesive Communities; and a Wales of Vibrant Culture and Thriving Welsh Language..

It is accepted that the Development may be considered contrary to the objective of a 'Healthier Wales' by reducing the physical area of allocated open space ; However the Act seeks not only to ensure opportunities for physical outdoor enjoyment, but also for mental health and for opportunities for both to be maximised. This report observes that the Museum does not remove the greater area of the park and will provide facilities which will make for more enjoyable all round use of it . The benefit of building a museum in term of education and understanding of mental health issues as well as surgical and other clinical advancements should also not be discounted, and the development might easily be considered to be a positive response to other Goals

The view that the Museum would be Contrary to the WFGA is therefore not concurred with. The Museum is considered positive in retaining and enhancing an important recreational open space, whilst offering a beneficial and mentally stimulating attraction within the Bay.

## 9.2 **Crime and Disorder Act 1998**

Section 17(1) of the Crime and Disorder Act 1998 imposes a duty on the Local Authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area. This duty has been considered in the evaluation of this application. It is considered that there would be no significant or unacceptable increase in crime and disorder as a result of the proposed decision.

## 9.3 **Equality Act 2010**

The Equality Act 2010 identifies a number of 'protected characteristics', namely age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation; marriage and civil partnership. The Council's duty under the above Act has been given due consideration in the determination of this application. It is considered that the proposed development does not have any significant implications for, or effect on, persons who share a protected characteristic, over and above any other person. The development is therefore not considered contrary to the Equality Act. As suggested by some objectors, and matters specifically relating to Disabled Parking are covered within the Transportation section of the report.

## 9.4 **Environment (Wales ) Act 2016**

The Environment (Wales ) Act 2016 imposes a duty on the Local Authority to seek to maintain and enhance biodiversity in the proper exercise of its functions. and in doing so to promote the resilience of ecosystems.

It is considered that the proposed recommendation / decision will not have any significant implications for, or effect on, biodiversity.

## 10. **PLANNING OBLIGATIONS**

- 10.1 It is not considered that it is necessary for the Applicant to enter into a legal undertaking to secure or limit any particular aspect of the proposal as all such matters can be adequately controlled by means of Planning Condition.

## 11. **CONCLUSION**

- 11.1 The proposed development is for a Museum encompassed by Use Class D1 of the Use Classes Order and the use is compliant with land use policies for the area.
- 11.2 The proposal is for a very high quality building which will enhance Cardiff Bay as a destination and visitor attraction.
- 11.3 The development will add confidence and stimulate future investment in the area
- 11.4 The proposal will impact on the amount of available open space but is considered to adequately compensate for that loss by provision of additional

publicly accessible facilities and would also be conditional on the implementation of a public realm/landscaping enhancement scheme.

- 11.5 The development will relocate, but will record, and most critically preserve, the small Listed building.
- 11.6 The Granting of Planning Permission is recommended subject to conditions.





<p>Jennifer Williams</p> <p>Howard Williams</p>	<p>As a resident of Cardiff Bay I signed a petition a few years ago to save Britannia Park from being developed into a site for the building of a tower block of luxury flats. The petition was signed by thousands of citizens of Cardiff who recognised the importance of this small green park for themselves and their children. It is the only green space in the Bay and as such is of great value to families especially those of us living in flats. It is universally recognised how beneficial such green open areas are for the well being of city dwellers.</p> <p>When the park was bought by Cardiff City Council we believed that our park was safe and that the council had acted in the best interests of its citizens, mindful of their welfare and particularly of that of their children. A Council serving it rate payers well.</p> <p>The proposal to build a museum in Britannia Park is contrary to all common sense. A Museum of Military Medicine would be suitable where there is already a history of a military tradition, such as in Brecon perhaps, or a site in Cardiff that is not used, and certainly not replacing a small popular local park.</p> <p>The building would be totally out of keeping with its surroundings and destroy a pleasant and well used public space.</p> <p>I therefore appeal to the development control to heed these very real concerns and understand how devastating the loss of the park would be for very many people. The museum would in no way enhance this part of the Bay, and its long term viability is questionable. Its upkeep will inevitably be a drain on Council funds.</p> <p>I hope you will appreciate the importance of the park and take the points I have made very seriously and keep Britannia Park safe for us and future generations.</p>	<p>O 1</p>
<p>Wyn Williams</p>	<p>Wel, wedi prynu Parc Britannia mae eich Cyngor am roi Amgueddfa (hyll) hanes meddygaeth filwrol o Aldershot (y mae dinasoedd eraill wedi gwrthod yn ddiau) yng Nghaerdydd. Ydych chi yn meddwl ei fod yn mynd i ddenu arian er na fydd yn unrhyw beth o'r fath? A bydd ein Parc yn cael ei golli, sef y peth gwaethaf oll wrth gwrs. Fel y welsoch gyda Ffair Arfau y Motorpoint - a gafodd ei wrthod i'n prifddinas yn ddiweddar - nid yw dinasyddion Caerdydd yn fodlon cael gwaed ar ein dwylo.</p> <p>Gwae arnoch chi wir, angen i chi ddysgu gwersi o'ch hanes hefyd.</p> <p>Gwrthwynebaf amgueddfa milwrol yng Nghaerdydd.</p>	<p>O 2</p>

	<p>Well, having bought Britannia Park your Council wants to put the (ugly) Museum of the history of military medicine from Aldershot (which other cities have undoubtedly refused) in Cardiff. Do you think it's going to attract money even though it won't be anything like that? And our Park will be lost, which of course is the worst thing of all. As you saw with the Motorpoint Arms Fair - which was recently denied to our capital city - the citizens of Cardiff are not willing to have blood on our hands.</p> <p>Woe bet on you really, you need to learn lessons from your history as well.</p> <p>I object to a military museum in Cardiff.</p>	
<p>Dr Tyra Oseng-Rees / Welsh Norwegian Society</p>	<p>Dear Sir</p> <p>The Welsh Norwegian Society (WNS) has significant concerns about the proposal to build the Museum of Military Medicine on Britannia Park. We are a membership society based at the Norwegian Church Arts Centre, founded in 1995 for the purpose of bringing together the community of people associated with the Norwegian Church, and to foster cultural links between Wales and Norway.</p> <p>Our society has held its monthly meetings at the Norwegian Church for the last 25 years,as well as special annual celebrations such as Norwegian Constitution Day.</p> <p>WNS is currently supporting Cardiff Council in their role as trustee of the Norwegian Church Preservation Trust, including, in the immediate future, helping to organise a series of events to celebrate the 150th anniversary of the Norwegian Church. Our concerns about the proposal to build the MMM in Cardiff Bay include the following key points:</p> <ol style="list-style-type: none"> <li>1) The loss of a large part of Britannia Park, which is designated parkland, firmly established as open green space in the blueprint of Cardiff Bay from the outset, and reaffirmed by subsequent planning decisions over the years.</li> <li>2) The scale and design of the proposed building, which will dominate the southern section of Britannia Park, and have a detrimental impact on the iconic views of the Norwegian Church from around the Bay.</li> <li>3) The impact on the childrens play area, which is a vital part of the parkland for local residents and visitors alike.</li> </ol>	<p>O 3</p>

	<p>4) Additionally, we share the concerns of the Friends of Britannia Park and Cardiff Civic Society that this project is not financially viable without considerable public subsidy. WNS is not simply anti-development and would support an appropriate, low-rise building on the gravel area (the footprint of the old visitor centre - the Tube) if it complemented Britannia Park as a recreational open space.</p>	
Jane Rosemary Trott	<p>I wish to record my strong objection to the two planning applications detailed above.</p> <p>We seem to be threatened frequently regarding the small park and green recreational space available to all ages in this vicinity.</p> <p>It's my understanding that the building was to be erected opposite the Grade 11 listed old Cardiff Bay train station at the junction of Lloyd George Avenue and Hemingway Road more in keeping with the existing buildings.</p>	O 4
Keith and Lynn Smith	<p>We are residents at Adventurers Quay and wish to object to the proposed development involving siting of the Museum of Military Medicine at Britannia Park. Britannia Park is the only green space in the vicinity of Roath Basin and Mermaid Quay, where there are multiple residences, commercial buildings and public amenities such as the Wales Millenium Centre and numerous restaurants. It therefore attracts numerous visitors, particularly on fine days or when events are happening in and around Roald Dahl Plas. It is therefore important to maintain the green space and the children's playground.</p> <p>Ideally, nothing should be built on the space, but the Museum of Military Medicine is a particularly inappropriate development, since there is no association of military medicine with the location and it is not the kind of facility that is in keeping with the other amenities in the area. Such an amenity would be much better located near the centre of the city, close to other museums, the castle and the university.</p> <p>It would also be a travesty to relocate the Lock Keeper's Cottage since its position is both of historical significance and at the moment is paired with the cottage on the other side of the lock.</p> <p>Please add our two names to any other persons who have objected to the development.</p>	O 5
Lynn Eynon [x2]	<p>Objection to Planning Applications 19/02506/MJR and 19/02508/MNR</p> <p>CONTENTS</p> <p>1 Introduction ..... 3</p> <p>1.1 What is proposed? ..... 3</p>	O 6

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1 INTRODUCTION

## 1.1 What is proposed?

The 19/02506/MJR seeks permission to build a Museum of Military Medicine on Britannia Park. The Design and Access Statement<sup>1</sup> describes (DAS 1.3) the Planning Context as: *Full planning application for the comprehensive redevelopment of the site. This comprises of: demolition of existing hard standing and redevelopment of the site to provide: a new cultural building of national significance up to 5 stories in height, with a GIA of 4,733sqm comprising of exhibition, library and archive space; business floor space; a café; retail space and surrounding landscaping, including the reconfiguration of Britannia Play Park.* This objection to 19/02506/MJR also applies to 19/02508/MNR, which seeks listed building consent to deconstruct and re-site Locky's Cottage to enable the construction of the Museum.

## 1.2 Reasons for Objection

### *1.2.1 Material considerations for this objection*

Material considerations giving grounds for this objection include:

- A. The precedent of previous planning decisions from the initial creation of the park as a valuable open space through subsequent decisions confirming that it should be kept as such.
- B. The loss of green open space in a ward and local area that has an existing deficiency in this, in breach of Local Development Plan Policy C4 on protection of open space.
- C. The scale and dominance of the proposed building on a site at which it will reduce the leisure amenity of the remaining green space and the visual amenity of existing vistas.
- D. The extra demand this new attraction will place on local transport and parking facilities, with no provision for disabled parking.
- E. The design and appearance of the external material, which is inappropriate for a park with heritage features.

### *1.2.2 Other considerations for this objection*

The applicants claim economic benefit for the local economy but that will only be realised if this proves to be a financially viable project. There is good reason to doubt that, at least without a substantial injection of public money, which would be hard to justify in a time of austerity and cut-backs. Evidence is provided below to support this concern. Lack of financial viability could pose a choice to Cardiff Council or to Welsh Government of either bailing out the project or seeing it collapse.

### *1.2.3 Risks and choice of site*

It appears that both Cardiff Council and Welsh Government have encouraged the Museum of Military Medicine to come to Cardiff, believing this would be beneficial to the city and disregarding the risks. These must be properly assessed before any further support is given. Building this Museum on Britannia Park cannot be progressed without the backing of Cardiff Council, who now own the land. If the Museum is to come to Cardiff Bay, the choice of site should accord with LPD policy and with an up-to-date masterplan for the Waterfront. Today there is no such masterplan. There is plenty of unused wasteland in the vicinity of Britannia Park, much of it in the hands of Welsh Government. Why has the choice been made to build over an open green space, in an area that is deficient in this, rather than proposing a brownfield site, where a development of this size could stimulate regeneration?

1 Planning Application 19/02506/MJR documentation: DAS

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## 2 WHY IS BRITANNIA PARK PROPOSED FOR THIS MUSEUM?

### 2.1 Why does the Museum wish to relocate?

The Application Form<sup>2</sup> (2), as published, does not give the Applicant's name but this is presumably the Museum of Military Medicine (MMM) Trust, as indicated by the address.

The Design and Access Statement<sup>3</sup> (1.9) explains that the relocation project is "*being undertaken by the Army Medical Services Museum Trust, which recognises that in order to build a sustainable future for its collections it needs to look beyond its current regimented museum set-up and invest in an outward facing, more inclusive, cultural enterprise*".

According to an MMM post<sup>4</sup>, relocation from its current location in Keogh Barracks at Aldershot is essential to make the museum financially viable:

*This issue is pressing since the Ministry of Defence has identified that support for all military museums will be withdrawn in the next decade, meaning that museums currently funded by MOD will have to become financially self-sustaining or fold. ... When MOD support is finally withdrawn, the AMS Museum will not be able to continue as a viable operation in its current location.*

As is explained below (see section 8) it has not yet been established that relocation will enable the Museum to meet its objective of becoming financially self-sustaining.

### 2.2 Why Cardiff?

According to an MMM post<sup>5</sup>, Cardiff was not first choice:



*The site in Cardiff was chosen after earlier approaches to other cities around the United Kingdom came to nought. Cardiff is viewed as an advantageous location due to its effective transport links; the city is no more than a two-hour drive from the South West, London and the West Midlands, with good rail and air connections. Cardiff City Council also recognizes the significance of bringing a national collection to the city as part of its tourism offer as it seeks to establish itself as a European capital. The Cardiff site offers the best opportunity to rebrand the Army Medical Services Museum as a fit-for-purpose modern museum.*

Other locations would, it appears, have been preferred but Cardiff appears to have been more enthusiastic, even though there are many places across the UK that have stronger connections with military medicine, either historically and currently. Cardiff Council's aspiration to host the collection is understandable but have the costs and risks been properly assessed?

### 2.3 Why Cardiff Bay?

#### 2.3.1 Bay Business Area

As AF (6) states, *"the site is located within the Bay Business Area (BBA) of the adopted Cardiff Local Development Plan 2006-2026 (LDP)."* The applicant appears to believe this justifies building over the park, with the Pre-Application Consultation Report<sup>6</sup> (p.39) stating *The relatively small loss of green space should be balanced against the benefits that the Museum manifests in light of policy KP10. The policy sees the Bay Business Area as a focus for government,*

2 Application Form (AF) for 19/02506/MJR

3 Design and Access Statement (DAS) for 19/02506/MJR

4 MMM Facebook page (17 June 2016)

5 MMM Facebook page (17 June 2016)

6 Pre-Application Consultation Report (PACR) for 19/02506/MJR

Objection to planning applications 19/02506/MJR and 19/02058/MNR Lyn Eynon: 5 December 2019  
Page 5 *tourism and leisure uses and states that future development should continue to enhance the waterfront as an attractive and diverse mixed-use location. but LDP KP10 does not mean that every piece of open green space in the Bay should be built over.*

PACR (p.41) argues that *"placing a museum on this site is just right to continue Cardiff Bay's 'arc of entertainment' and draw people further towards the barrage"*. As a footnote to DAS (1.4) explains, the concept of an 'arc of entertainment' in the Bay dates back to the dockland regeneration undertaken in the 1990s by the Cardiff Bay Development Corporation. It is still Cardiff Council policy that the Bay should host entertainment sites, as LDP (5.14) confirms. But as will be shown below (see 3.1.1), the value of

open green space within the waterside development was recognised during the regeneration and Britannia Park was created to meet that need. The loss is not small relative to the size of the local green space.

### *2.3.2 Claimed connection with Cardiff Bay*

*PACR (p.41) asserts Cardiff Bay has a direct connection with the Army Medical Services story, as it was the embarkation point for wounded soldiers in WWI on their way to the military hospitals in South Wales and the western side of England. and*

*The site currently proposed provides an excellent location for the museum. Proximity to historic elements of the docks roots the museum's programme in the history of the docklands which, in addition to their commercial significance, played a crucial part in the military history of the UK. The association between Cardiff Bay and AMS is not especially strong. At the time of WWI Cardiff was a major port so it is unsurprising that wounded soldiers were embarked here, as they were at many other ports along the British coast. There has never been a significant military hospital here. The original selection of Cardiff did not mention any special connection between Cardiff Bay and AMS. This seems to have been dreamed up as a justification after the location was chosen.*

### *2.4 Why Britannia Park?*

According to MMM7, *"in April 2018 Cardiff Council suggested an alternative site on Britannia Quay, opposite the Norwegian Church on Harbour Drive".* This location is Cardiff Council's choice, not the Museum's, so we need to ask why. *2.4.1 Britannia Park not the original choice* Discussions over a move to Cardiff started in 20158:

*"The Board has been in negotiation with Cardiff City Council since last autumn about the possibility of establishing The Museum of Military Medicine in the city, and with its aid is investigating the purchase of the Bute Street Railway Station and adjacent Welsh Government land in Cardiff Bay on which to build a new facility that will meet the Board's aspirations for the collections. In January 2016 the then chair of the Board met with Edwina Hart, Minister for the Economy, who gave her blessing to the project. Since then work has been taking place behind the scenes to ensure that the Trust will be in a position to purchase the building and land and secure funding for the new development."*

However, the owners of the Cardiff Bay (Bute Street) station had other plans, submitting a planning application<sup>9</sup> in February 2017 to refurbish the Grade II listed building and convert it into offices. This

7. [museumofmilitarymedicine.org.uk/2019/07/26/a-transformational-world-class-development-in-wales](http://museumofmilitarymedicine.org.uk/2019/07/26/a-transformational-world-class-development-in-wales)  
8 MMM Facebook page (17 June 2016)  
9 Planning Application 17/00224/MJR

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was approved in October 2018 and building work is now complete. It is doubtful if what is now proposed for the Museum would have fitted in the available land there, listing obligations would have constrained options, and it could have blocked options for Metro routes. In any case, an alternative site was needed.

By July 2017, the proposed site had moved to the junction of Lloyd George Avenue and Hemingway Road. Approval was given to the Museum Trust in November 2017<sup>10</sup> for the construction on that site of a museum, including café, exhibition rooms, collection stores and office space. The site was 0.3ha and the building was at first proposed to be around half the size (2,352sqm) of that now proposed for Britannia Park<sup>11</sup>, although by the time it reached Planning Committee its dimensions<sup>12</sup> had expanded to close to those of the current proposal. There was no provision for a 'deep space' experience.

Although there was one local objection about the loss of open space, the site did not host a public park so this location did not cause wide concern.

This site would again be reviewed to allow for a new 15,000-capacity Arena<sup>13</sup>, for which Cardiff Cabinet in February 2018 selected Atlantic Wharf<sup>14</sup> as its preferred location. By March 2019, this had expanded to a £500 million scheme<sup>15</sup> with bars, restaurants, waterside apartments, office space, hotel and 2,000-space car park. In July 2019, Council announced plans<sup>16</sup> to buy the Red Dragon Centre, hoping to open the Arena by end-2023. Full regeneration may require relocating County Hall. These ambitions made Hemingway Road unavailable for the Museum.

MMM Trust appears to have welcomed the change of proposed site to Britannia Park, noting that "*the new location has enabled the museum to reconsider the facility as a new paradigm in visitor attractions, offering a world class visitor experience as well as being a centre for research, innovation and leadership*"<sup>17</sup>. It is easy to see the appeal to the Trust of a Cardiff Bay location closer to the waterfront and the main flow of visitors but this should not mean building on open green space.

#### 2.4.2 Purchase of Britannia Park

In November 2018, a paper<sup>18</sup> was presented to Cardiff Council Cabinet by Cllr Russell Goodway (Cabinet member for Investment and Development) “to seek Cabinet authority to acquire a strategic site in Cardiff Bay known as Britannia Park at Harbour Drive, Cardiff Bay in order to protect the Bay edge for leisure use and to provide opportunities for appropriate investment to further enhance the amenity of Cardiff Bay” (PLBP, para 1). The associated map shows that this includes not just Britannia Park itself but also Waterfront Park along the Bay front and the strip of green land between Britannia Quay and Roath Lock. At the time, the land was owned by Associated British Ports.

PLBP (para 7) explains *In order to promote Cardiff Bay as a leading UK leisure destination and to control development around the waterfront primarily for leisure use, the Council is keen to secure all of the Bay edge into public ownership. The cost of acquiring the Britannia Park site will need to be recovered through the appropriate development of the Britannia Park site and the wider Bay edge in Council ownership. This will be done in a way that seeks to enhance the visitor experience and recognises the importance of public access and public space along the waterfront.*

10 Planning Application 17/01850/MJR

11 Application Form (sections 15 and 19) for 17/01850/MJR

12 69m length x 23m width x 19m height (Committee Report for 17/01850/MJR)

13 <https://www.bbc.co.uk/news/uk-wales-40244568>

14 <https://www.bbc.co.uk/news/uk-wales-south-east-wales-43010308>

15 <https://www.walesonline.co.uk/business/commercial-property/plans-revealed-500m-cardiff-bay-15976095>

16 <https://www.walesonline.co.uk/news/local-news/cardiff-bay-red-dragon-arena-16541052>

17 [museumofmilitarymedicine.org.uk/2019/07/26/a-transformational-world-class-development-in-wales](http://museumofmilitarymedicine.org.uk/2019/07/26/a-transformational-world-class-development-in-wales)

18 Purchase of Land at Britannia Park (PLBP): paper for item at Cardiff Council Cabinet, 15 November 2018

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This statement does not explain what “*appropriate development*” would be, other than to recover the cost of acquisition, even though the choice of Atlantic Wharf for the Arena, with its implications for the Museum location, had been taken 9 months earlier. Missing here is any recognition that Cardiff Bay is not just a tourist destination but a place where people live and work, with a requirement for access to open green space.

Cabinet resolved<sup>19</sup> to accept the PLBP recommendation to “agree to the purchase of the Britannia Park site on the terms set out in Confidential Appendix 2”. The Quarter 3 2018-19 Performance Report<sup>20</sup> presented to February 2019 Cabinet confirms that the land has been bought:

*The Council acquired the strategic site of Britannia Park, Cardiff Bay following Cabinet approval in November 2018. This is to protect the Bay edge for leisure use and to provide opportunities for appropriate investment which would enhance the area. The cost of this acquisition was £2.8m, funded by capital receipts following the disposal of land interest held in Central Square.*

Again, no clarification is provided on what might constitute “appropriate investment which would enhance the area”.

#### *2.4.3 Proposed sale of land at Britannia Park*

PLBP (8) noted that “subject to planning permission, a potential sale has been agreed in principle for the area of land formerly occupied by the Cardiff Bay Visitor Tube”. Cabinet resolved<sup>21</sup> to accept the PLBP recommendation to “delegate authority to the Director of Economic Development to dispose of the site edged dashed green in Confidential Appendix 3 subject to independent valuation”. Without the information in this confidential appendix, it cannot be determined precisely which land is covered

by the delegated disposal authority, in particular whether the “site edged dashed green” corresponds exactly to “the area of land formerly occupied by the Cardiff Bay Visitor Tube”, or not. The land proposed for the Museum extends far beyond that formerly occupied by the Tube.

Nor do we know if MMM Trust was the intended purchaser at the time of the November Cabinet. As Cardiff Council is recorded as the landowner (AF 27), it would appear that land required for the Museum has not yet been sold.

### 3 BRITANNIA PARK AS A VALUABLE OPEN SPACE

#### 3.1 Britannia Park as a public park

AF (6) claims that the whole site is previously developed land. This is only correct insofar as this land was once part of the Port of Cardiff but it has been a public park since this area was regenerated in the early 1990s. It is included in Cardiff Council’s list of parks<sup>22</sup>. AF (10) admits that there are trees on the

site that will be impacted by this development. This small open green space is much appreciated, especially in the summer months, by visitors to the Bay, by workers in offices there, and by local residents, many of whom live in flats without gardens or balconies.

### *3.1.1 The creation of Britannia Park*

19 Cardiff Cabinet Agenda and Decisions 15 November 2018, item 12

20 Quarter 3 2018-19 Performance Report presented to Cardiff Council Cabinet, 21 February 2019

21 Cardiff Cabinet Agenda and Decisions 15 November 2018, item 12

22 Cardiff Council Find a Park search

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Britannia Park was created as part of the Capital Waterside development, a substantial component of the regeneration directed by the Cardiff Bay Development Corporation (CBDC). Outline planning permission for Capital Waterside was sought in 199023, granted in April 1991, then renewed in 199424.

This application was for *“the development of 800,000 ft<sup>2</sup> [74,322sqm] of offices, together with hotel, shops, residential, and infrastructure works at Roath Basin”*. The large area of land covered by this application sits mainly to the northwest of Roath Basin, and today hosts both the Senedd and the Millennium Centre. The outline consent *“also included for the provision of two areas of parkland”*. The *Capital Waterside Development Framework Plan* (see 11.1) shows Britannia Park at its southern tip, with Roath Basin to the northwest and Roath Lock to the southeast

On 26 February 1993, Associated British Ports (ABP) – then owners of this land – applied<sup>25</sup> for full planning permission for *“hard and soft landscape works”* at Britannia Park, land which had been part of the former dock area but was by then vacant. By this time, one area of parkland (then referred to as Waterside Park, running along Cardiff Bay from where the Senedd would be built to the relocated Norwegian Church) had already been provided. The site size for the second park was stated as 6,270sqm, Harbour Drive was proposed for parking, and it was recognised that the park would *“provide opportunities for leisure and retail uses to max 21,000 sq. ft [1,951sqm]”*, a little under a third of the total area. Permission was granted on 15 April 1993, as it would *“provide a valuable area of open space on this important waterfront site”*, in line with the earlier consent for two parks within the Capital Waterside development. The Permission for Development statement for this second park explains what was proposed for the future Britannia Park:

2. The site covers an area of approximately 0.7 hectares, situated to the north of the Norwegian Church and bordered to the north and east by Roath Basin. The first part of the park was the subject of an earlier planning application (June 1992) which has subsequently been implemented and includes for a dockside walkway and soft landscaping works. The current proposal includes for extensive soft landscaping, together with other hard landscaping and footpath systems.

3. The park will also house the proposed new site for the Cardiff Bay Visitor Centre, which is a subject of a separate application<sup>26</sup>, which is to be reported to the Committee in May. In addition, the area of the proposed park will incorporate the land surrounding the recently relocated Customs and Excise Building. Vehicular access to the park is from Harbour Drive, which was approved in November 1992 as part of the infrastructure works for Roath Basin.”

The layout then approved (see 11.2) is close to that of the park today, other than an extension of the old Customs House building (see 3.2.4), which is allowed for in the layout initially proposed for Britannia Park (see 11.3).

#### 3.1.2 Current use of the land proposed for development

AF (6) claims that the land on which MMM will be built is currently vacant with the last use of the site being for the Cardiff Bay Visitor Centre. But a public park is not vacant land. Only the gravelled area could be described as vacant and the required land extends well beyond that, stretching the full length of Roath Lock. AF (6) itself states “*The application site consists of hard and soft landscaped open space which includes the Grade II Listed Lock Keepers Cottage, a children’s play area and the ‘Beastie Benches’ piece of public art.*” The “*soft landscaped open space*” is park grass and trees. AF (4) gives the site area as 2,670 sqm and admits that this will entail the loss of 0.15ha (1,500 sqm) of open space.

23 Planning Application 90/00479/R (CDBC, 1990)

24 Planning Application 94/00305/R (CDBC, 1994)

25 Planning Application 93/00291/R (ABP, 1993)

26 Planning Application 93/00405/R

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#### 3.2 Planning precedents for Britannia Park

PACR (p.41) acknowledges that “*the local planning Authority will determine the application on its own merits, however all previous applications on and around the site are of relevance to understand the planning context of the proposed development site*”. There have been a number of proposals to develop on Britannia Park but all attempts to change its basic character as an open space have failed.

### *3.2.1 Visitor Centre*

In 1993, the Cardiff Bay Visitor Centre<sup>27</sup> (popularly known as the Tube), having stood by the Pierhead Building since 1990, was moved to the gravelled area by Roath Lock, rented by Cardiff Council from ABP. This use had been included in the approved plans for Britannia Park. The Tube proved popular with visitors. It was an architecturally innovative low-rise construction that did not intrude on either the grassed area or the children's playground, nor overshadow the Norwegian Church. Dismantled in 2010 when ABP needed to access the land to construct the Origami Bridge at the entrance to Roath Lock, the Tube was by then too old to be moved again, having been designed to last only five years.

### *3.2.2 Lightship*

A Lightship used as a Christian Centre was given permission<sup>28</sup> to moor in Roath Basin in 1993, where it remained until 2015, when it was sold off and tugged away. The moored ship did not intrude on the use of the park for other purposes and was widely thought to enhance its character.

### *3.2.3 Locky's Cottage*

In June 1994, permission was granted to Grosvenor Waterside<sup>29</sup> to change the use of the vacant Lock Keeper's Cottage by Roath Lock to restaurant/retail with external paving and surface treatment. A month later, an associated application<sup>30</sup> was approved to install double-glazed period style metal windows into existing openings in the cottage, and to connect drainage services, electricity, gas meter and telecommunications. A small café operated from Locky's Cottage until 2017.

### *3.2.4 Waterguard public house*

In February 2000, HMA Architects were granted permission<sup>31</sup> to refurbish and extend the old Customs House building to form part of a public house (the Waterguard) with integral first floor manager's flat, plus associated landscaping which would have included the paved space with chairs and tables on the edge of the grassed space. This development had been under consideration from the outset, as evidenced by the original site plan (see 11.3) and the required land was within the original provision for leisure and retail uses (see 3.1.1).

### *3.2.5 Adventure golf course*



In 2007, a proposal<sup>32</sup> to construct a “*themed adventure golf course*” was refused as it “*would result in the loss of an area of publicly available green recreational amenity space*” and “*by reason of its siting and design is considered to be an inappropriate and incongruous development having a detrimental impact on the aesthetic quality of the area*”. This refusal was made in line with then existing versions of the Local Development Plan, Planning Policy Wales and Planning Guidance on Open Spaces, but amenity and aesthetic considerations remain valid today.

27 See [https://en.wikipedia.org/wiki/Cardiff\\_Bay\\_Visitor\\_Centre\\_\(The\\_Tube\)](https://en.wikipedia.org/wiki/Cardiff_Bay_Visitor_Centre_(The_Tube))

28 Planning Application 97/1811/C, initially temporary then subsequently renewed and made permanent in 2012

29 Planning Application 94/00627/R

30 Planning Application 94/00628/R

31 Planning Application 99/01907/C (a variant of 99/01906/C)

32 Planning Application 07/00462/C

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### 3.2.6 Temporary attractions

In 2008, an application<sup>33</sup> to install a Ferris Wheel on Britannia Park was approved but only for three months and on condition that “*the use of the site shall be discontinued after the 15 September 2008*”, following which “*the Ferris Wheel shall be removed within seven days of this date and the ground restored to its former condition immediately upon its removal*”, as “*the use is of a temporary nature and its long-term retention would adversely affect the character and appearance of the area*” and “*in order to restore the site to its original condition in the interests of visual amenity*”. Similarly, permission was granted to Cardiff Council<sup>34</sup> in both 2012 and 2013 to install a temporary Ferris Wheel on the gravel area, provided that “*the wheel shall be removed ... and the land made good to the satisfaction of the local planning authority as soon as practically possible ... to accord with the terms of development applied for and to ensure for an appropriate restoration of the land in a timely manner*”.

Such approvals have always insisted on restoring the character of the park as an open green space.

### 3.2.7 Hyflyer and Skyflyer

A 2008 application<sup>35</sup> from Lindstrand Aeroplatforms for a Hiflyer balloon, gondola, landing platform and winch house was initially approved but then quashed at judicial review, having been referred to the Court of Appeal. An associated application<sup>36</sup> for advertisements on the Hiflyer balloon and gondola panels was approved but rendered meaningless by the failure of the main proposal. Similar proposals in 2009 for a Skyflyer Aerostat balloon, gondola and landing platform were refused<sup>37</sup> or withdrawn<sup>38</sup>.

### *3.2.8 Dolffin Quay*

The Dolffin Quay application<sup>39</sup> submitted by ABP on 28 July 2017 would have radically changed the nature of Britannia and Waterfront Parks and its vicinity. It sought permission for comprehensive redevelopment, including a 24-storey block with 200 residential units, a dockside building, a Bayside building and three kiosks. This would have entailed demolishing the hard standing, moving Locky's Cottage and the loss of most green space in Britannia and Waterfront Parks.

When the Dolffin Quay proposal surfaced to public view in mid-2016, it immediately caused concerns, some of which were raised during the Pre-Application Consultation in November 2016. By April 2017, a campaign had formed, which would gain wide support in defence of the only green space in that part of the Bay<sup>40</sup>. Many were also concerned about the impact of a large development on the Norwegian Church and its iconic views<sup>41</sup>. The campaign gathered 15,000 petition signatures, held public events on the threatened parks, raised over 200 formal objections, and won the backing of local elected representatives. On 31 October 2017, ABP withdrew their application.

The campaign had succeeded but campaigners knew that struggles over land use and development rarely result in outright victories. Many worried that ABP might return with a similar proposal after time had elapsed, memories had faded, and opponents had moved on. The suggestion that Cardiff Council could purchase the land from ABP looked to be a positive move that could secure the green space from the ravages of private development, but that is not how it has worked out.

33 Planning Application 08/01497/C

34 Planning Applications 12/01220/DCI and 13/00623/DCI

35 Planning Application 08/02713C

36 Planning Application A08/0205C

37 Planning Application 09/01424C

38 Planning Application 09/01953C

39 Planning Application 17/01848/MJR

40 <https://www.change.org/p/cardiff-city-council-save-cardiff-bay-s-last-green-space>

41 <https://www.change.org/p/cardiff-council-save-the-norwegian-church-s-waterfront-park-setting>

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### 3.2.9 *Zip wire*

A recent application<sup>42</sup> for a temporary zip wire from the roof of St. David's hotel to land on the gravelled area near the Norwegian Church has been withdrawn in the face of public opposition. Most of the objections came from residents of Ocean Reach, near the hotel, but concern was also raised over the implications of a 20m landing tower on Britannia Park that would tower over the Church.

### 3.3 A false and misleading claim

The applicant's claim (DAS, 1.3) that "*history indicates that the principle of development on the site has been accepted*" is false, as this record of the fate of proposals clearly shows. All applications going beyond what was originally conceived for Britannia Park, and which would have fundamentally and permanently changed its character, have been rejected, withdrawn or judicially quashed.

#### 3.3.1 *Misunderstanding of Capital Waterside*

In support of its claim that the principle of development has been accepted, DAS (1.3) refers to the Capital Waterside outline planning permission applications<sup>43</sup> but fails to mention that the provision of two areas of parkland was inherent to the granted consent for these. The issue is not the suitability of the wider Bay Waterfront area for a development such as MMM but its location on a specific site that has been explicitly designated as a park within that regeneration area.

#### 3.3.2 *Irrelevance of reference to Porth Teigr*

In similar vein, DAS (1.3) argues that "*additionally the site lies immediately north of the Porth Teigr mixed-use development in Cardiff Bay, where planning permission was granted for a mixed-use development of housing, business, commercial and associated works on the former operational port land in July 2008*"<sup>44</sup>. The issues and opportunities around Porth Teigr are discussed below (see 9.1.2), but Britannia

Park does not lie within Porth Teigr. Once again, the issue is not whether MMM is an appropriate development for the eastern side of Cardiff Bay but whether it should be built over an existing park.

The importance of open space is recognised in the Porth Teigr Permission for Development<sup>45</sup>, which states:

*Unless otherwise agreed in writing with the Local Planning Authority no residential development in any phase shall take place until detailed layout plans showing the extent and location of public open spaces, to include play areas and play equipment, together with a programme for their implementation have been submitted to and approved by the Local Planning Authority. The approved open spaces shall be laid out in accordance with the plan and programme and shall thereafter not be used for any purpose other than as open space.* The need for public open space is confirmed in Schedule Two of the Section 106 Agreement. This allows for an Off Site Public Open Space Contribution but states that this “*shall be used by the Council for the design, provision or improvement and maintenance of informal or formal open space in the locality of the Site in accordance with the Council’s SPG*”. The architects should not quote a planning application requiring additional public open space in the eastern Bay waterfront area to justify building on open space that already exists in Britannia Park.

42 Planning Application 19/01426/MNR

43 Planning Applications 90/00479R and 94/00305R

44 See Planning Application 03/00099/C

45 Planning Application 03/00099/C

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#### 4 LOSS OF OPEN SPACE

DAS (4.2) recognises that “*the site has been identified as open amenity space in the most recent open space survey (May 2019), with the play park identified as recreational open space*” and hence that “*as a result C4 of the Local Development Plan (LDP), the Green Infrastructure Supplementary Planning Guidance (SPG) and Open Space Technical Advice Notes (TGN) 16 apply*”. It further acknowledges that “*the site falls within the Butetown ward which has a deficit of 23.16 hectares of recreational open space*”.

##### 4.1 Public policy on open spaces

###### 4.1.1 Wellbeing of Future Generations

PACR (p.40) argues “the museum is open to all age ranges and in particular aims to engage both younger and older children, providing education on the major breakthroughs in medical knowledge that have been established during times of conflict”. It then claims that “this responds directly to the well-being of future generations act goals for a globally responsible Wales and a prosperous Wales”.

This looks only at what may be gained and ignores what will be lost through the damage to Britannia Park. Attention must be paid to all the well-being goals listed in the Wellbeing of Future Generations Act46, notably section 4 “A healthier Wales: A society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.” National Resources Wales observe that “research shows that when communities engage with their local green spaces, and when green spaces are fully integrated with the built environment - there are direct health and well-being benefits for people, wildlife and habitats”47. Earlier this year, the Future Generations Commissioner for Wales sponsored a study into how green spaces improve our wellbeing48.

#### 4.1.2 Welsh Government policy

Welsh Government guidance on Open Spaces (TAN 16)49 states (para 3.7):

*Playing fields and green open spaces have special significance for their recreational and amenity value and, particularly in towns and cities, for their contribution to the urban environment and for supporting biodiversity. Playing fields and green spaces add interest and vitality to living and working environments. ... In addition to their environmental role they can also offer health and well-being benefits, and opportunities for community engagement. ... Only where it can be clearly shown that there is no deficiency, should the possibility of their use for alternative development be considered. Playing field loss will need to be justified in relation to policies in the LDP, PPW and, where available, be consistent with the findings of the Open Space Assessment.*

#### 4.1.3 Local Development Plan

Cardiff LDP Policy C4 states:

*Development will not be permitted on areas of open space unless:*

- i. It would not cause or exacerbate a deficiency of open space in accordance with the most recent open space study; and*
- ii. The open space has no significant functional or amenity value; and*
- iii. The open space is of no significant quality; or*
- iv. The developers make satisfactory compensatory provision; and, in all cases;*

v. *The open space has no significant nature or historic conservation importance.*

46 *Well-being of Future Generations (Wales) Act* (Welsh Government, 2015)

47 Communities and Regeneration Enabling Plan 2015-2020, p.3

48 #SocialPrescribingJanuary A world-leading study into how green spaces improve our well-being

49 [gov.wales/sites/default/files/publications/2018-09/tan16-sport-recreation-open-space.pdf](http://gov.wales/sites/default/files/publications/2018-09/tan16-sport-recreation-open-space.pdf)

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LDP (4.140) recognises that within the Bay Business Area “*future development should continue to enhance the waterfront as an attractive and diverse mixed-use location*”. Mixed-used includes open spaces. LDP (4.142) explains that “*New residential development within the Central and Bay Business areas will support the delivery of balanced, mixed use areas where, by virtue of their proximity to public transport, leisure, employment and community facilities, can create sustainable urban neighbourhoods and contribute to the daytime and evening economy.*” Sustainable urban environments require green spaces, not just steel, glass and concrete.

4.2 Loss of open space resulting from this proposal

The applicants have not made a convincing case that these public policies on open space should not apply to this proposal.

*4.2.1 Deficiency of open space*

DAS (4.2) admits that “*the scheme does reduce the overall open space in the area in an already deficit ward*”, stating “*much of the proposed site for development is laid to gravel, however development would involve the reduction of Britannia Park’s open green space by about 780sqm*”. The Butetown ward is not over-supplied with open space. The usually resident population of Butetown was 10,125 at the 2011 census but it is growing rapidly, with an estimate for 2018 of 13,700. The most recent Opens Space Survey<sup>51</sup> gives a figure of 12.00ha of recreational open space in Butetown, implying 0.88ha per 1000 residents for 2018, well below the LPD Policy C5 requirement for “*a minimum of 2.43 hectares of functional open space per 1,000 projected population*”. The ward population continues to rise but the amount of open space does not. Now is not the time to build over a park.

If Cardiff Council were to apply LDP policy C4(i), that alone should suffice to stop the proposed development. The application contains no proposal to compensate the loss of green space in Britannia Park by creating alternative open space in the vicinity.

PACR (p.39) dismisses the loss of green space as “*relatively small*”, while DAS (4.2) claims that “*the siting of the building is done to reduce the loss*” and that “*the benefits afforded by the scheme compensate for this loss*”. But the loss is not small relative to the size of the park. DAS (1.3) gives the proposed MMM development site as 2,650sqm, 42% of the 6,270sqm<sup>52</sup> of the area of Britannia Park

On the site area, the museum building would cover around 1,680sqm<sup>53</sup>, 27% of the total park area, significantly impinging on grass, trees and children’s playground.

#### *4.2.2 Amenity value and quality*

DAS (4.2) recognises that Britannia Park is an open amenity space. If this proposal is accepted, then it will lose that role, not only because of the direct loss of green space but because it will also trigger a transformation in the nature of what remains. DAS (6.4) explains that “*the Council have ambition to upgrade the Britannia Park site to create an exciting visitor destination in its own right with the facility to host external events*”. Today, the gravelled area plays an uncontroversial role in occasionally supporting such events but, with that and much else disappearing under the new building, it appears that Council aspires to abolish Britannia Park’s function as a community asset performing a vital role for local residents and workers, as well as for visitors.

DAS does not assess the amenity value or the quality of Britannia Park but this was done for the Dolffin Quay application<sup>54</sup>. ABP were keen to underplay its value but the Final Planning Statement (FPS 6.61)  
<sup>50</sup> Cardiff Council ward population estimate, derived from ONS mid-year population estimates

<sup>51</sup> *Local Development Plan 2006-2021: Open Space Survey* (Cardiff Council, September 2009), figure 5

<sup>52</sup> Planning Application 93/00291/R

<sup>53</sup> DAS (1.3) states that the building would measure approximately 70m in length, 24m in width.

<sup>54</sup> Planning Application 17/01848/MJR

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Page 14 had to concede, using the results of the Open Space Assessment (2007), that “*the results of the above study indicated that Britannia Park had relatively good functional and amenity value and was*

*of relatively good quality in six of the seven categories*". The weakest category was accessibility and even there the consultants accepted (FPS 6.60) that "*relative to the other open spaces in Butetown, and across Cardiff as a whole, Britannia Park ranks relatively highly in terms of its accessibility*". The consultants acknowledged that "*Britannia Park scored highly in relation to strategic value, possibly due to its contribution to regeneration*" (FPS, 6.61).

To justify building over the park against the requirements of LDP C4 they tried to play word games and claim that "*overall Britannia Park was not of 'significant' functional or amenity value or of 'significant' quality*". But for local residents (especially the high proportion without gardens) the amenity value of this open green space is very significant, then and now.

#### *4.2.3 Built space no substitute*

DAS (4.2) argues that the loss of open space "*could be compensated for with high quality publicly accessible space on the ground floor of the museum with an approximate area of 900sqm*", which "*would help increase the site's functional use and would benefit the park through access to additional facilities including the cafe space, public exhibitions and WCs etc.*" This claimed 'compensation' substitutes closed built space for open green space. That is not the intention of the LDP. Cafés already exist locally; the park will not be improved by building over it. It also appears that some of the ground floor will only be accessible to paying visitors (see 8.2.4).

#### 4.3 Children's playground

PACR (p.40) acknowledges that "*the area of the play park will be slightly reduced*". DAS (4.2) states that the loss would be approximately 130sqm but dismisses that as being "*mostly grass*" as if children did not enjoy playing on grass. PACR (p.40) proposes that "*the layout of the equipment is reconfigured to maintain current functionality*" and claims that "*the shelter provided by the museum would create a more usable playspace without overshadowing due to the transparent atrium element in the design*".

There are much easier ways to provide shelter than a 5-storey building, the microclimate and wind effects of which have not been examined (see 5.2.4).

### 5 SCALE AND DOMINANCE OF BUILDING

#### 5.1 Scale of building



AF (5) states “*the building would measure approximately 70m in length, 24m in width and 21.2m in height. The building would compose of two distinct elements, a full glazed flat roofed box to its southwestern end and partially fretted Corten skin finished building with sawtooth roof design along the rest of its length*”. AF (17) states that this will provide 4,733 sqm of new gross internal floorspace.

PACR (p.40) states “*The size and scale of the building is considered appropriate for a new landmark and is modest in comparison with neighbouring developments such as Atradius or Gloworks*”. In fact, according to its Design and Access Statement<sup>55</sup>, the Gloworks building is about a quarter smaller, with a gross internal floor area of 3,660 sqm (para 412) and is only very slightly taller at 22m (para 408).

The Atradius building is larger but has recognised architectural merit. It is doubtful if this could be said of what would be a glass box stuck on the side of a larger steel box (see Figure 3.1, DAS p.30). Neither Atradius nor Gloworks was built over a valued local park. On its proposed site, the museum would dominate what is left of the park, as well as the setting of the iconic Norwegian Church. Its 55 Planning Application 11/00026/DCI documentation

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footprint is similar to that of the main building in the withdrawn Dolffin Quay application. Building this Museum on the wasteland near Gloworks would not raise the same objections.

## 5.2 Quality of remaining public green space

DAS (2.1) claims:

*By placing the museum along the southern edge of Britannia Park, the quality of the surrounding public green space is improved by increasing urban legibility, providing public facilities and creating a more sheltered outdoor environment.*

Each element of this claim is questionable, given the scale and dominance of the intended building.

### 5.2.1 Surrounding public green space

The Museum would not, as DAS claims, be surrounded by green space, as this would shrink to little more than a decorative lawn in front of it.

### 5.2.2 Urban legibility

Urban legibility is an urban design concept, defined by the Design Council<sup>56</sup> as “*ease of understanding: a place that has a clear image and is easy to understand*”, including elements such as landmarks and focal points, views, clear and easily navigable routes, gateways to particular areas, lighting, works of art and craft, signage and waymarkers. It is hard to see how the museum would increase this. The Norwegian Church already provides an ideal focal point for this area of the Bay and visitors are not disoriented by an unobstructed view of Roath Lock.

### 5.2.3 Public facilities

Public facilities are explained (DAS p.22) to include “*the cafe space, public exhibitions and WCs etc.*”. If the proposal were just for a small café and public toilets on the gravel area, it is doubtful if there would be any objection but this proposal is on a much larger scale, while food and drink are already available at both the Waterguard pub and the Norwegian Church. The exhibitions can be accepted as of public benefit but no justification is given as to why the park has to be destroyed to display them, when alternative locations exist nearby.

### 5.2.4 Outdoor environment

A more sheltered outdoor environment is claimed to be provided by boxing-in the remains of Britannia Park. The architects assume that the building will provide some protection from wind, if not rain, but large buildings have complex wind effects. The *Dolffin Quay Environmental Statement, vol.1 ch.13: Wind Microclimate*<sup>57</sup> concluded (13.8.7) “*the magnitude of effect at the amenity spaces is classified as medium adverse*”, i.e. Dolffin Quay would have worsened wind conditions. It proposed various features to mitigate this adverse effect. No microclimate analysis for MMM has yet been conducted so a sheltering effect should not be assumed.

As the Museum will occupy the south-eastern edge of the park, it will shut out much of the sun, as well as views of Roath Lock. Scott Brownrigg have missed the point that a core feature of Cardiff Bay as a recreation space is that it is open to the water. On this logic, the Bay would benefit from a high wall around it to shield visitors from the elements.

### 5.3 Visual amenity

DAS (p.35) claims that the museum will enhance visual amenity:

56 Councillors Guide to Urban Design  
57 Planning Application 17/01848/MJR documentation

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*The site has visual amenity due to its location in Cardiff Bay, being both a highly visible element and having excellent views from the site.*

### *5.3.1 The Museum as a focal point*

DAS (4.2) explains that *“the museum is designed to be a landmark building and create a focal point in the area offering greater visual amenity”*. DAS (5.7) claims that *“the presence of the museum and highquality public space around will give this vista well-deserved prominence fulfilling the opportunity identified in the Pierhead Conservation Area Appraisal”*.

But this site already provides a prominent and much appreciated vista with the Norwegian Church. The museum would be a tall building for that location in the Bay and would dominate the skyline. At 21.2m high, the proposed building would be 5.3m higher than the top of the Church spire (15.9m). PACR (p.40) claims *“the key vistas from the Bay to the Norwegian Church will remain”* but, although the design shows a glass block immediately behind the Church, this still carries a risk of ruining iconic views of the Church which have frequently been used in promotional material for our city<sup>58</sup>

### *5.3.2 Views from the Museum*

DAS (4.2) spells out the advantages offered by the *“excellent views from the site”*. To take advantage of these, *“a key concept in the design of the museum was creating views from the building across the Bay at various defined points”* DAS (4.2), while *“the perforated copper facade acts a porous skin that cloaks the Ramp, allowing for characteristic views of the city landscape through strategically located cut-outs”* (DAS 4.1). Additionally, *“an open and transparent atrium space faces out on to a new plaza and Cardiff Bay waterfront, benefiting from views of Penarth Marina and the cliff beyond”* (DAS 3.1).

No doubt these would be enjoyed by users of the museum but Britannia Park is not the only Bay location that could provide similar features (see 9.1).

## 6 TRANSPORT AND PARKING

### 6.1 Handling extra visitors to Cardiff Bay

#### *6.1.1 Expected visitor numbers*

The application includes no additional provision for either access (AF 8) or parking (AF 9), although the Transport Statement<sup>59</sup> predicts (TS 6) 225,000 visitors to the Museum by 2024. There are reasons to doubt this number (see 8.2.5) but there will certainly be increased traffic to the Bay and the applicants have a responsibility to explain how the number of visitors they predict will be handled. They cannot claim socio-economic benefits for Cardiff Bay from additional tourists (see 8.2.5) while ignoring the consequences of that increase for local infrastructure.

AF (19) states that MMM will be open from 09:00 to 17:00 every day. That implies an average of a little over 600 visitors by car each day or just under 40 an hour. But the number of visitors will not be evenly spread. Higher numbers are to be expected on weekends and holidays, while visiting patterns to the Bay are influenced by season and weather. The predicted numbers imply thousands of daily visitors on peak days. The Transport Statement does not give any results for peak flow analysis.

#### *6.1.2 Expected number of cars*

TS (7) explains

58 For example, see [www.visitcardiff.com/travel-trade/cardiff-bay](http://www.visitcardiff.com/travel-trade/cardiff-bay) or [www.cityofcardiff.com/church.html](http://www.cityofcardiff.com/church.html)

59 Transport Statement (TS) submitted as supporting documentation for 19/02506/MJR

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*The estimated split of visitor arrival is based on data from similar from public attractions in Cardiff and similar organisations in the UK. In line with the modal split required by KP8 ... we anticipate 50% of the visitors arriving by car*

Even if Cardiff Council's target of a 50:50 modal split between journeys by car and journeys by walking, cycling and public transport (LDP KP8) is achieved by the time the Museum opens, 225,000 annual visitors would imply 112,500 arriving by car. Assuming an average 1.6 people per car<sup>60</sup>, that would mean around 70,000 cars per year or a daily average of around 200. There are factors that would increase that

number (e.g. car occupants not intending to visit the museum) or reduce it (e.g. museum visitors who would have come to the Bay anyway). Account must also be taken of the fact that progress towards Cardiff Council's target modal split has to date been too slow to meet the target, with Cardiff's Public Sector Board acknowledging that the rate of growth in those using sustainable transport needs to accelerate<sup>61</sup>. Overall, 200 should probably be treated as a minimum value for the daily average of additional cars. This average does not suffice to model the transport impact of the museum on the Bay. Without peak flow analysis, the maximum daily number cannot be predicted with any accuracy but if the Museum meets its visitor target that would imply a peak of several hundred extra cars a day. Similarly, these will not be spread evenly through Museum opening hours, with most arriving or leaving from midmorning to late afternoon.

#### *6.1.3 Visitor impact on traffic*

Outside rush hours, there is today not much traffic congestion in Cardiff Bay, except when there are major events. But to be confident that the impact of the Museum would not have detrimental effects on congestion, we would need to map the missing peak flow analysis against a calendar of expected events, together with the promised but not yet provided Waterfront masterplan, so that the consequences of the Museum could be understood alongside those of other major proposals, such as the new Arena<sup>62</sup>, extensions to rail/tram lines for the South Wales Metro<sup>63</sup> or Crossrail<sup>64</sup>, cuts to Cardiff Bus routes (such as the number 6 which no longer runs along Britannia Quay to serve Porth Teigr)<sup>65</sup>, or the Lloyd George Avenue cycleway<sup>66</sup>.

In the absence of that analysis and that plan, the congestion impact of extra car traffic to and from the Museum must be left open. It should be independently assessed before approving the application.

#### *6.1.4 Visitor impact on parking*

DAS (4.3) states that "*there are a number of car parking facility located close by*" and hence "*to promote sustainable forms of travelling to the Museum site, no car parking facilities will be included within the development layout*". This is a rationalisation of the fact that including such facilities within the available land at Britannia Park would not be practical, rather than an accurate assessment of local parking capacity. There is already a known shortage of parking spaces in Cardiff Bay. Schroders UK Real Estate Fund has earlier this year applied<sup>67</sup> to double the size of the existing Mermaid Quay car park on Stuart Street to meet anticipated demand from its renewal of Mermaid Quay.

TS (7) casually assumes that visitors will have access to “*parking in adjacent car parks*” and that “*we expect to come to an arrangement with the nearby multi- storey car park*”. This shows a lack of 60  
[www.statista.com/statistics/314719/average-car-and-van-occupancy-in-england](http://www.statista.com/statistics/314719/average-car-and-van-occupancy-in-england)

61 Cardiff in 2018, p.23

62 <https://www.walesonline.co.uk/business/commercial-property/plans-revealed-500m-cardiff-bay-15976095>

63 [gov.wales/sites/default/files/publications/2018-06/south-wales-metro-brochure.pdf](http://gov.wales/sites/default/files/publications/2018-06/south-wales-metro-brochure.pdf)

64 [www.walesonline.co.uk/news/wales-news/cardiff-crossrail-map-transport-trams-16529975](http://www.walesonline.co.uk/news/wales-news/cardiff-crossrail-map-transport-trams-16529975)

65 [www.walesonline.co.uk/news/wales-news/cardiff-bus-cut-routes-crisis-15734996](http://www.walesonline.co.uk/news/wales-news/cardiff-bus-cut-routes-crisis-15734996)

66 Cardiff Cycleway 3.1 Public Consultation

67 Planning Application 19/01012/MJR

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awareness of local conditions, where the demand for parking spaces fluctuates greatly depending on season, holiday/weekend, weather or major events on the waterfront or popular shows in the Millennium Centre. It is implausible that additional demand generated by the Museum could be accommodated at peak times without extra parking spaces. The mooted arrangement with a nearby car park might not materialise.

## 6.2 Lack of disabled parking

### 6.2.1 Policy requirements

LDP T5 (Managing Transport Impacts) states (5.230):

*The purpose of this Policy is to ensure that all new developments for which planning permission is required:*

...

iii. *Make satisfactory provision for access, parking and circulation, particularly by pedestrians, cyclists, public transport users and disabled people with mobility impairments and particular access needs;*

This requirement is in keeping with the expectations of the Equality Act 2010, which “*requires service providers to take positive steps to ensure that disabled people can access facilities and services ... to avoid disabled people being placed at a ‘substantial disadvantage’, compared to non-disabled people, when accessing the facilities or services*”<sup>68</sup>. Campaigning groups such as Disability Wales insist that a

Design and Access Statement should show “*how accessibility by different modes of transport has been considered, from drop-off point to the door*”<sup>69</sup>.

#### 6.2.2 Failure to comply

In breach of LDP T5, MMM – despite expecting 225,000 visitors a year – has made no parking provision at all, let alone a satisfactory one, for disabled people with mobility impairments and particular access needs. Instead, TS (7) just states that, having parked at the multi-storey<sup>70</sup>, “*visitors will then walk to the site*”, nearly half a mile away<sup>71</sup>. It cannot be assumed that the few disabled parking spaces along Harbour Drive or Britannia Quay will be vacant, especially at times of peak demand.

This neglect of the interests of disabled visitors is not only in breach of the LDP but also shows a surprising lack of consideration for veterans who may have benefitted from Army Medical Services but still have a residual disability, many of whom may be interested in visiting the Museum. It is a step backwards from the current location at Keogh, where disabled parking is available within the barracks for anyone with mobility difficulties<sup>72</sup>.

## 7 DESIGN AND HERITAGE

### 7.1 Proposed design

#### 7.1.1 Suitability of building materials for this location

PACR (p.40) asserts

<sup>68</sup>[www.evershedssutherland.com/global/en/what/articles/index.page?DLR\\_disabled\\_parking\\_230812](http://www.evershedssutherland.com/global/en/what/articles/index.page?DLR_disabled_parking_230812)

<sup>69</sup> Planning for Inclusive Access in Wales: good practice guidance toolkit, p.22

<sup>70</sup> This is presumably the Q-Park Cardiff Bay off Bute Place, although this is not explicitly stated.

<sup>71</sup> Google Maps calculates the straight-line distance as 0.3 miles but the walking distance exceeds this.

<sup>72</sup> [museumofmilitarymedicine.org.uk/about/disabled-access](http://museumofmilitarymedicine.org.uk/about/disabled-access)

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*The materials chosen for the proposed museum will comply with all relevant regulations to ensure they don't pollute, are robust and easy to maintain. Corten steel is a widely used material with a proven track record thanks to being used on a number of successful buildings in the UK. However, Corten steel is usually thought to be unsuitable for buildings in marine environments such as Cardiff Bay, on the damp South Wales coast:*

*Corten is not advised for public realm application in coastal and harsh-weather environments or for areas which will remain permanently damp. The build-up of the patina relies on the surface being regularly dried and so careful design must be employed allowing good ventilation and uniform exposure to the weather.*<sup>73</sup>

In the wrong environment, serious problems can emerge:

*The idea behind this striking material is that a surface layer of rust will form, protecting the steel underneath from further deterioration and eliminating the need for paint. ... The result should be a maintenance-free material with a unique aesthetic. But in the real world, different conditions like too much humidity often mean that the rust layer never reaches a stable point. Eventually, the metal can become perforated and may need to be replaced.*<sup>74</sup>

Sea salt is a particular concern:

*Exposure to high concentrations of chloride ions, originating from seawater spray, salt fogs or coastal airborne salts, is detrimental. The hygroscopic nature of salt adversely affects the 'patina' as it maintains a continuously damp environment on the metal surface. In general, weathering steel should not be used for bridges within 2km of coastal waters, unless it can be established that airborne chloride levels do not exceed the salinity classification of S2 (i.e.  $cl < 300\text{mg}/\text{m}^2/\text{day}$ ) to BS EN ISO 9223.*<sup>75</sup>

Cardiff Bay itself is fresh water but the salt water of the Bristol Channel is just 1km away beyond the Barrage<sup>76</sup>. Approval should not be given for the use of Corten steel as a building material in Cardiff Bay without independent confirmation that the local microclimate is suitable for its use.

#### *7.1.2 Visual amenity of building materials*

Corten steel is a product which can provoke strong reactions, for or against. Architects and sculptors are probably more favourable towards it than is the general public. Whether it is appropriate for a large building on this site is questionable. PACR (p.40) claims that "*references to the industrial buildings of the docks in the building's design root the museum in its historical context in a poetic manner*". DAS (7.0) explains that "*the colour of corten steel makes a subtle reference to the Pierhead Building and, coupled with the unique form, ties it visually to the industrial history of the Bay*".



Many might find it hard to conceive of rusted steel as poetry. Some Corten steel buildings have over time gained public acceptance but within urban environments, as is the case with the Barclay Centre in Brooklyn<sup>77</sup>. On the Hemingway Road site, the proposed design might indeed have offered a distinctive focal point at the southern end of the bland Lloyd George Avenue. But Britannia Park is a small green oasis within what risks becoming an over-developed waterfront. By simply taking a design initially produced for one location and reusing it in another, the architects have paid no attention or shown any sensitivity to the different characteristics of the new site.

<sup>73</sup><https://www.marshalls.co.uk/commercial/blog/specifying-cor-ten-for-external-architectural-use>

<sup>74</sup> <https://greenfuture.io/sustainable-living/corten-steel/>

<sup>75</sup> [https://www.steelconstruction.info/Weathering\\_steel#Marine\\_environments](https://www.steelconstruction.info/Weathering_steel#Marine_environments), taken from Corus guide on *Weathering Steel Bridges* (p.8)

<sup>76</sup> Google Maps calculates the straight-line distance as 0.6 miles

<sup>77</sup>[www.brownstoner.com/development/barclays-center-rusted-corten-steel-facade-brooklyn](http://www.brownstoner.com/development/barclays-center-rusted-corten-steel-facade-brooklyn)

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## 7.2 Heritage

AF (6) states

*The site is located a short distance (between 50m and 150m) from the Grade I Listed Pierhead building, the seat of the Welsh Assembly 'The Senedd' (undesignated), the Wales Millennium Centre (undesignated) and directly adjacent to the Grade II Listed Waterguard Public House, and the Norwegian Church (Undesignated). ... The site abuts the Pierhead Conservation Area and is in visible distance of the Mount Stuart Square Conservation Area.*

The Heritage Impact Assessment in Section 6 of DAS provides interesting information but its purpose is to justify deconstructing and re-siting what is known as Locky's Cottage, a former workmen's hut at the sea lock to Roath Basin, which is a Grade II listed building, in order to make room for MMM to be built along the side of Roath Lock. Planning Application 19/02508/MNR, which seeks listed building permission for re-siting, is consequential on 19/02506/MJR.

### *7.2.1 Deconstruction and re-siting of Locky's Cottage*

Locky's Cottage is listed by CADW as an "*interesting survival from port and for group value with Roath Basin sea lock*"<sup>78</sup>. DAS (6.4) proposes moving Locky's Cottage would be moved from its current location by the side of Roath Lock to the other side of Britannia Park, close to Roath Dock and the Waterguard public house. Re-siting would separate it from Roath Lock and from the workmen's hut on the other side of the lock, losing its historical context and group value, even though the chosen option would be less damaging than some of those considered.

Rejecting 19/02506/MJR would make re-siting unnecessary and hence remove the need for 19/02508/MNR.

#### *7.2.2 Proposed new use of Locky's Cottage*

DAS (6.4) asserts that "*the Lock Keepers Cottage failed as a commercial catering venture*" but in fact it was a functioning business until 2017 when ABP ended its lease in preparation for the proposed Dolffin Quay development, even if its future as an outdoor café in a competitive environment was uncertain. In either case, there are new plans for the cottage.

DAS (6.4) explains

*As well as introducing a museum of national significance, the Lock Keepers Cottage will remain in the ownership of Cardiff Council and is intended to be regenerated for reuse as an ancillary building strategically positioned to support outdoor events taking place in Britannia Park. These events include Cardiff Council and external organisers, such as the new Military Museum of Medicine.*

This confirms the intention not only to build over a significant part of Britannia Park but to convert what is left into an events space rather than an open green space usable, by local residents and workers as well as by visitors, for peaceful relaxation and enjoyment.

#### *7.2.3 Norwegian Church*

Although the Norwegian Church is not a listed building, it is a heritage asset included in the Glamorgan Gwent Archaeological Trust's Historic Environment Record<sup>79</sup> and on the National Monuments Record for Wales, where it is described as "*now a significant feature of the mixed architecture of Cardiff Bay*"<sup>80</sup>. It is much loved, as evidenced by the 10,000 signatures gathered against the impact of the  
78 [cadwpublic-api.azurewebsites.net/reports/listedbuilding/FullReport](https://cadwpublic-api.azurewebsites.net/reports/listedbuilding/FullReport), reference number = 14060  
79 Archwilio, the Welsh Historic Environment Records online, Primary Reference Number = 00813s

80 coflein.gov.uk/en/site/9321/details/norwegian-church-bute-east-dock-cardiff  
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Dolffin Quay proposal on the Church<sup>81</sup>, or by the large attendance at its recent celebration of its 150<sup>th</sup> Anniversary. It is appreciated not only for itself and its significance as a symbol of Cardiff's multicultural history and continuing connection with Norway, but also for the amenity value of its tranquil setting on the Bay, which risks being lost by the construction of a large Museum in its immediate vicinity.

The potentially damaging impact on views of the Church has been explained above (see 5.3.1).

#### *7.2.4 Dock wall*

AF (6) acknowledges that "*a number of pieces of dockside 'furniture' (Captans, mooring ties etc.) form part of the Grade II listed dockside wall*"<sup>82</sup>. The Museum will make the dockside less accessible.

### 8 IS THIS PROPOSAL VIABLE?

As building this Museum over Britannia Park depends on the willingness of Cardiff Council to sell or lease land it owns, approving this application is not simply a matter for the Planning Committee. Unless Council takes a deliberate decision to make its land available, then the project cannot go ahead on this site and the park will be saved. In considering that decision, Council must take a wider view of the potential costs and benefits of the proposal than the Planning Committee is required to do.

#### 8.1 Claimed benefits

The PACR (p.41) asserts that the financial viability of MMM at this location is "*not a material consideration for planning*". But the applicant seeks to justify the proposal by claiming benefits that can only be realised if the project proves viable in itself and for the wider Bay economy

##### *8.1.1 Claimed economic benefits*

Referencing the Local Development Plan's<sup>83</sup> Key Policy (KP) 10, PACR, p.39 asserts that "*the museum improves the leisure and tourist facilities and generates significant benefit for the local economy, making the area more attractive overall*", while AF (18) claims that MMM will require 11 Full Time Equivalent employees. But it is not the intention of the LDP to promote the construction of idle buildings, which is what the Museum will become unless the Trust has the revenue sources to make this a viable project. A new all-weather attraction could benefit Cardiff Bay, where businesses often struggle through the winter

months when visitor numbers drop sharply. But while the Museum might draw more people to the Bay, it could also draw them away from existing attractions and even put them in financial jeopardy. Demand is not infinite. For example, Techniquest, which is itself in the process of reorienting to deal with an imminent loss of grant funding (see 8.3.1) could suffer from this competition. The MMM Trust is under no obligation to consider such possible consequences but Cardiff Council should do so, as publicly owned land and public money are involved.

## 8.2 Financial viability

Any economic, employment and future generations benefits will only be realised if the project proves to be financially viable. The applicant has yet to demonstrate that it will be.

81 [www.change.org/p/cardiff-council-save-the-norwegian-church-s-waterfront-park-setting](http://www.change.org/p/cardiff-council-save-the-norwegian-church-s-waterfront-park-setting)

82 [cadwpublic-api.azurewebsites.net/reports/listedbuilding/FullReport](https://cadwpublic-api.azurewebsites.net/reports/listedbuilding/FullReport), reference number = 14062

83 Cardiff Local Development Plan 2006-2026

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### *8.2.1 Current financial position of the Museum Trust*

The latest MMM Trust Accounts<sup>84</sup> show that the Museum does not yet have the funds required for relocation nor the capacity to become self-financing once the MOD has withdrawn funding, without new sources of regular income. The move to Cardiff will be expensive, which the Trust realises as it is "*actively fundraising, with a mix of grants and investment*"<sup>85</sup>.

In year-ending 31 March 2018, £143k was spent on charitable activities. Excluding a one-off donation from RAMC of £25k and Grant-in-Aid of £78k (both of which should cease when MOD funding ends) the Museum had income of just £18k, a trading surplus of £14k plus £4k in donations, legacies and investment income, i.e. a deficit of £125k without MOD support. The limited information available for the previous year suggests a similar outturn. The Trustees do not believe they have free reserves. Running the Museum at Cardiff will be more expensive. At Keogh, it pays neither utility charges (except phone) nor business rates, nor rent. Just £9k is recorded for museum depreciation but this will be much higher in new premises. For comparison, property costs for the Techniquest are £379k<sup>86</sup>, primarily for its main building in Cardiff Bay, which is smaller than the proposed Museum<sup>87</sup>. Salaries and related costs for 5 staff amount to over half (£87k) of charitable expenditure and an expanded operation will require more paid staff, as acknowledged in the application.

MMM has recognised the weakness of its original case by adding a new section 1.8 to DAS88, entitled *Bringing the Museum of Military Medicine to Cardiff*, which asserts that “MMM’s business plan identifies a series of income streams that will enable the museum to become self-sustaining”. But from the information provided, it seems that “will” should really be “might” or at best “should”, as nothing definite is stated in this section.

8.2.2 *The Museum’s ambitions* The Summary of the proposal (DAS 1.9) suggests that the Museum would be fairly traditional in its approach: *The new Museum of Military Medicine will hold the national collection of art, artefacts, archives and exhibits that has been collected and displayed at the Keogh Barracks in Aldershot – now proposed to relocate to Cardiff Bay. ...*

*The archives are used by researchers in medicine and medical history as the records go back to the Napoleonic wars. This research is used to advance medical care and technology. Essentially there are three types of exhibition/archive spaces.*

1. *Environmentally sensitive papers and artefacts*
2. *Artefacts, exhibits and interactive displays that require “black box” environment*
3. *Galleries for exhibits that are better suited to controlled/diffused naturally lit spaces*

*In addition to the permanent and temporary exhibition rooms, the building also benefits from research and innovation areas for professionals and university students; as well as meeting rooms which could be leased for different purposes; a library; a function room; office space and a deep space which is an immersive interactive experience.*

There is a hint of more in its stated intention that “*the new museum will tell the story of the four constituent Corps in a way that is engaging, interactive and lively, and will meet the expectations of contemporary audiences*”. The Summary mentions a ‘deep space’, briefly described in DAS 3.1

:

*The ground floor will also contain an immersive experience called ‘deep space’ which offers an interesting counterbalance to the overall feeling of openness. This space is a controlled and fully*

84 Museum of Military Medicine Accounts and Trustees’ Annual Report (year ending 31 March 2018)

85 [www.bbc.co.uk/news/uk-wales-50249739](http://www.bbc.co.uk/news/uk-wales-50249739)

86 Techniquet (Charity no.517722) Accounts (year ending 31 March 2019)

87 Planning Application 18/02513/MJR

88 This section was not included in the DAS version submitted for Pre-Application Consultation.

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*enclosed environment that is designed to create a “suspension of reality” offering and fully immersive experience. This detaches the visitor temporarily from reality and transports them to another time and place.* It now appears from the way the Museum’s wishes to present the proposal<sup>89</sup> that this ‘deep space’ will be central to attracting visitors, offering “*a super-high definition 8K immersive video space*” with “*2D and 3D visuals, exploring science, medicine, art and history*”, while “*alongside exhibitions and ‘immersive’ visitor experiences, the visual room could also be used to train doctors*”. The model for this is the Ars Electronica Center<sup>90</sup> (Museum of the Future) in Linz, which has galleries looking at the human body, robotics, technology and artificial intelligence.

#### *8.2.3 Funding requirements for relocation*

According to Trust Accounts<sup>91</sup>, £2m has been provided by the Treasury for relocation, with a further £132k from other sources. Of this, £392k has been spent, leaving £1,740k at 31 March 2018, some of which will since have been spent. This will not suffice to build the new Museum, even on a traditional model. Cardiff Council spent up to £2.4m back in 2011 to construct the Doctor Who Experience building<sup>92</sup>, which was smaller at 3,000sqm<sup>93</sup> than MMM at 4,733sqm and not designed as a permanent structure. Opening in 2009 for Linz’s year as Europe’s Capital of Culture, the Ars Electronica Center (AEC) cost 30m euros<sup>94</sup>, and installing Deep Space 8K technology there in 2015 cost a further 1.2m euros<sup>95</sup>. The Museum Trust believes their proposed Cardiff building could cost £30m<sup>96</sup>. For what DAS (1.8) calls “*pre-build revenues*”, MMM is “*currently working with academic partners and the NHS*” towards a set of qualifications and courses, from which “*MMM will receive a commission against fees raised and a contribution to any costs incurred*”, but there is no certainty over whether or not this will result in anything tangible or what the anticipated income would be. Similarly, it states that “*capital funding will be raised from grants and donations, sponsorship, and investment*” but with no indication of what these sources might be, how committed they are, or how much funding is promised. Some potential partners or donors may not want to be too closely associated with an organisation that includes “*increase military recruitment*” in its charitable objectives<sup>97</sup>.

#### *8.2.4 Ongoing funding requirements*

DAS (1.8) states “*post build, a mix of conferencing, retail, catering, admissions charging, temporary exhibitions, events, and venue hire is being planned, and educational programmes and innovative research partnerships will all contribute to the long-term viability of the project*” and that MMM will “*feature*

*an active public engagement programme*". Again, there are no numbers provided, nor clarity over whether these sources will provide the revenue needed to sustain the Museum. The inclusion of admissions charging is a major change from the original DAS, which did not mention this, implying that the current policy of free access at Keogh would continue. There is no doubt that this will be necessary as other sources of income from the Museum will not suffice. For comparison, Techniquet lost £49k on café, sales and hires last year, although it had made £228k the previous year<sup>98</sup>. No evidence is provided to show that admissions charging will provide adequate revenue.

89 [www.bbc.co.uk/news/uk-wales-50249739](http://www.bbc.co.uk/news/uk-wales-50249739)

90 [en.wikipedia.org/wiki/Ars\\_Electronica\\_Center](http://en.wikipedia.org/wiki/Ars_Electronica_Center)

91 Museum of Military Medicine Accounts and Trustees' Annual Report (year ending 31 March 2018)

92 [www.bbc.co.uk/news/uk-wales-south-east-wales-43159603](http://www.bbc.co.uk/news/uk-wales-south-east-wales-43159603)

93 [coflein.gov.uk/en/site/420193/details/the-doctor-who-experience-cardiff-bay](http://coflein.gov.uk/en/site/420193/details/the-doctor-who-experience-cardiff-bay)

94 [en.wikipedia.org/wiki/Ars\\_Electronica\\_Center](http://en.wikipedia.org/wiki/Ars_Electronica_Center)

95 [ars.electronica.art/press/en/2016/02/22/14959](http://ars.electronica.art/press/en/2016/02/22/14959)

96 [www.bbc.co.uk/news/uk-wales-50249739](http://www.bbc.co.uk/news/uk-wales-50249739)

97 Museum of Military Medicine documents

98 Techniquet (Charity no.517722) Accounts (year ending 31 March 2019)

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### *8.2.5 Expected visitor numbers*

The Transport Strategy<sup>99</sup> (6) claims that "*the museum has produced a comprehensive business plan with advice from tourism and business planning experts*" but this is not included in the 19/02506/MJR documentation and does not appear to be publicly available; at least, I have been unable to find it. TS (6) asserts that *Based on visitor data gathered by academic research and following attendance data from public buildings in Cardiff, the museum predicts the following visitor numbers:*

*2023 175,000 visitors*

*2024 225,000 visitors*

*2025 225,000 visitors*

For revenue generation these need to be paying visitors, rather than just those passing through public areas. How credible are these visitor number predictions? Some comparisons will be helpful.

□ The US National Museum of Health and Medicine<sup>100</sup> (NMHM), previously the Army Medical Museum, once attracted up to half a million visitors a year on the National Mall in Washington but now attracts only 50,000 visitors at a US Army site near the Capital Beltway, despite free admission and free parking. At Cardiff Bay, MMM will be outside a barracks location but some distance from the UK's major population centres. Unlike NMHM, it will charge for admission.

□ In 2018, 176,923 people visited AEC and participated in its events, with 105,000 at the annual festival<sup>101</sup>. Ars Electronica is long-established as a cultural, educational and scientific institute, based at Linz since 1979, focusing on the interlinkages between art, technology and society, with an annual festival and conferring the prestigious Prix Ars Electronica awards<sup>102</sup>. It is not explained how MMM can reach and then exceed these numbers almost from the outset, without history or reputation. MMM's narrow focus on military medicine is likely to attract a narrower audience than Ars Electronica's broad coverage of new media art.

□ Over the last year, 170,827 visited Technquest<sup>103</sup>, which is the UK's longest established science centre<sup>104</sup>, with a mission since 1986 to embed science in Welsh culture through interactive engagement that has found wide resonance with parents, schools and public bodies. It is hard to see military medicine having the same appeal, particularly with families and schools, who have been at the core of Technquest's public.

□ The Doctor Who Experience had to close in September 2017 as numbers fell<sup>105</sup>. A family ticket price of £49 did not suffice to bring in enough revenue to be self-sustaining.

If the viability of the Museum will depend on income from paying visitors, a more credible case should be provided on predicted paying visitor numbers, the expected entry fee, and the anticipated revenue. The number of visitors will depend on the entry fee, so cannot be determined without knowing that. Attractions which raise charges to boost income risk entering a 'death spiral' as visitor numbers fall further.

### 8.3 Public risks

DAS (1.9) states

99 Transport Statement (TS) submitted as supporting documentation for 19/02506/MJR

100 [www.medicalmuseum.mil](http://www.medicalmuseum.mil)

101 [ars.electronica.art/press/en/2019/01/07/rueckblick](http://ars.electronica.art/press/en/2019/01/07/rueckblick)

102 [en.wikipedia.org/wiki/Ars\\_Electronica](http://en.wikipedia.org/wiki/Ars_Electronica)

103 Financial Statement for charity number 517722

104 [www.technquest.org/about-us/the-story-of-technquest](http://www.technquest.org/about-us/the-story-of-technquest)



105 [www.walesonline.co.uk/news/wales-news/closure-doctor-who-experience-cost-14317405](http://www.walesonline.co.uk/news/wales-news/closure-doctor-who-experience-cost-14317405)

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*The facility is intended to be of national/international importance and has received enthusiastic support from Welsh Government and Cardiff City Council.*

Public authorities also have a responsibility to judge the risks of undertakings.

### 8.3.1 Will the Museum require public funding?

The Museum Trust says it does not intend to need public money<sup>106</sup>, although it has already received £2 million from the Treasury in 2016 towards relocation in Cardiff<sup>107</sup>. Even allowing for various suggested income sources and possible private donations, it is doubtful if such an institution could be delivered or survive without some public contribution.

Recent investigations have shown that arts and culture remain highly dependent on public sector funding despite efforts over many years to find private sector alternatives. The 2017 *Mendoza Review*<sup>108</sup> on English museums found (p.30) that *Our research suggests that many museums rely, to a large degree, on public funding. Around 59% of Accredited museums rely on some form of public funding, not including National Lottery.*

The following year, the Culture, Welsh Language and Communications Committee of the National Assembly for Wales reported in *Building Resilience*<sup>109</sup> that *having investigated opportunities for growing non-public income for arts organisations in Wales, we have found that they face very real difficulties in doing so. Given the Welsh Government's request for the sector to reduce its dependence on public funding, it is important to understand that such a change is likely to require additional public sector support in the short term, especially when considered against the backdrop of austerity and the dominance of London and the South East in UK fundraising.* (p.9)

It confirmed that

*Public funding remains essential to a flourishing arts sector. It provides direct support for a wide range of arts organisations that would in many cases be unable to exist without it. It is also the bedrock that affords them the time and space to seek funding from the private sector and from trusts and foundations.* (p.30)

Comparable examples also suggest MMM will struggle without further injections of public money.

- NMHM is federally funded as a division of the Defense Health Agency Research and Development Directorate<sup>110</sup> but without additional Department of Defense money it has been unable to build a new museum<sup>111</sup>.
- Ars Electronica receives funding from the City of Linz, the Province of Upper Austria and the Republic of Austria<sup>112</sup>, and also from the EU<sup>113</sup>. The City of Linz contributed 500,000 euros towards the cost of building the AEC Deep Space facility<sup>114</sup>. Sustained effort over many years to expand its commercial for-profit activities has reduced but not eliminated its dependency on its declining public subsidy.
- Techniquet has relied for around 40% of its income on funding from Welsh Government, worth £1.3m in 2016 when it was told this would be cut by 22% and that its grant would end by 2019,

106 [www.bbc.co.uk/news/uk-wales-50249739](http://www.bbc.co.uk/news/uk-wales-50249739)

107 [www.gov.uk/government/publications/autumn-statement-2016-libor-commitments](http://www.gov.uk/government/publications/autumn-statement-2016-libor-commitments)

108 [The\\_Mendoza\\_Review\\_an\\_independent\\_review\\_of\\_museums\\_in\\_England.pdf](#) (MR)

109 Building Resilience: Inquiry into non-public funding of the arts

110 [www.medicalmuseum.mil](http://www.medicalmuseum.mil)

111 [en.wikipedia.org/wiki/National\\_Museum\\_of\\_Health\\_and\\_Medicine](http://en.wikipedia.org/wiki/National_Museum_of_Health_and_Medicine)

112 [ars.electronica.art/about/en](http://ars.electronica.art/about/en)

113 [ars.electronica.art/press/en/2019/01/07/rueckblick](http://ars.electronica.art/press/en/2019/01/07/rueckblick)

114 [ars.electronica.art/press/en/2016/02/22/14959](http://ars.electronica.art/press/en/2016/02/22/14959)

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raising fears that it might need to close<sup>115</sup>. The end-date for the core grant has now been extended to April 2021 to give time to find alternative income sources<sup>116</sup>. In response, Techniquet announced plans for The Science Capital<sup>117</sup>, with an extension of its building on Stuart Street and repositioning to extend and diversify its audiences, but moving forward with this has needed £3m awarded through the UK Government Department for Business, Energy and Industrial Strategy (BEIS) and the Wellcome Trust's Inspiring Science Fund, plus match funding from various sources, including Welsh Government's 'Invest to Save' fund<sup>118</sup>. Alongside private sources, public money for capital spending has again proved to be essential.

- Cardiff Council stopped subsidising the Doctor Who Experience after losing over £1.1m, having overestimated the amount of money the exhibition would bring in over five years, a move later described by Cllr Goodway as a bad business decision<sup>119</sup>. Without this subsidy, the Experience had

to close.

Each of these comparisons is relevant, either by the nature of the attraction or by its location in Cardiff Bay. They confirm the general picture that public money continues to play a vital role in the museum sector and that without this museums or similar bodies might not survive.

### *8.3.2 Hard choices for public funding*

In the austerity climate of the past decade, this dependency on public money has placed museums at risk. The Museum Association reported in 2017 that “*in a time of public funding cuts, 64 museums have closed across the UK since 2010 and more are at risk*”<sup>120</sup>. Further closures will have occurred since. Museums supported by local authorities appear to be most at risk, either of closing or of having to take steps that reduce their quality or impact (MR p.32).

Real-terms public funding of the arts has declined substantially in Wales in recent years, with Welsh Government funding of the Arts Council declining by 18% in real-terms between 2011-12 and 2017-18 and local authority funding of Arts Portfolio Wales falling from £11 million in 2011-12 to £5.1 million in 2016-17<sup>121</sup>. Museums have not been immune as cuts to the Welsh block grant are passed down<sup>122</sup>. Pressure on budgets has been a fact of public life for a decade and continued since the relocation of MMM to Cardiff was first suggested. For Welsh Government, “*in 2019-20, the Welsh budget will be 5% lower in real terms, on a like for like basis, than at the start of the decade in 2010-11 – this is equivalent to £800m to spend on public services*”<sup>123</sup>. This has inevitably worked its way down into the budgets of Welsh local authorities which, despite increasing other income sources such as council tax, saw an 8.3% fall in real gross revenues from 2009-10 to 2017-18<sup>124</sup>. With a growing population, Cardiff Council faced a budget gap of £35.2m in 2019-20 and anticipated £93m over the following three years<sup>125</sup>. There is no spare money to cover shortfalls that may be encountered by MMM Trust, either for the initial build of the Museum or to save it from bankruptcy if hoped for income does not suffice.

### *8.3.3 Site risks from potential failure*

If public subsidy is not provided, there is a serious risk that the Museum will not be viable and will have to close, leaving an empty building on what is today a valued park. It may not even be completed.

115 [www.bbc.co.uk/news/uk-wales-35303392](http://www.bbc.co.uk/news/uk-wales-35303392)

116 [www.bbc.co.uk/news/uk-wales-politics-37234805](http://www.bbc.co.uk/news/uk-wales-politics-37234805)

117 [www.techniquet.org/about-us/the-science-capital](http://www.techniquet.org/about-us/the-science-capital)

118 [www.techniquet.org/blog/techniquet-secures-3m-funding-science-capital](http://www.techniquet.org/blog/techniquet-secures-3m-funding-science-capital)

119 [www.walesonline.co.uk/news/wales-news/closure-doctor-who-experience-cost-14317405](http://www.walesonline.co.uk/news/wales-news/closure-doctor-who-experience-cost-14317405)

120 [www.museumsassociation.org/news/20092017-ma-publishes-information-for-museums-facing-closure](http://www.museumsassociation.org/news/20092017-ma-publishes-information-for-museums-facing-closure)

121 [seneddresearch.blog/2018/11/26/challenging-times-for-the-publicly-funded-arts-in-wales](http://seneddresearch.blog/2018/11/26/challenging-times-for-the-publicly-funded-arts-in-wales)

122 [www.museumsassociation.org/museums-and-arts-organisations-in-wales-prepare-for-more-funding-cuts](http://www.museumsassociation.org/museums-and-arts-organisations-in-wales-prepare-for-more-funding-cuts)

123 Forward to Draft Budget 2019-20 outline proposals, p.1

124 Cut to the bone? An analysis of local government finance (Guto Ifan and Cian Sion)

125 Cardiff Council press release on budget consultation, 9/11/2018

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Granting planning permission would create a new precedent for this land. As has been shown above (see section 3), planning precedent to date confirms the role of the park as valuable open space. Once that precedent is broken, the way would be open for future commercial or residential planning applications. Even though permission for 19/02506/MJR would presumably be for a category D1 (nonresidential

institution) development, applying for subsequent change of use is easier than applying to build over open space. If the land were to be sold by Cardiff Council following approval of this application, then the park would have returned to private hands, allowing it to be sold on by MMM Trust and making it harder for its future to be secured in the interest of future generations.

## 9 ARE THERE ALTERNATIVES TO BRITANNIA PARK?

### 9.1 Alternative sites

If the concerns over viability are resolved and if the Museum is to come to the Cardiff area, other locations with stronger historic or current military or medical associations should be considered. If Cardiff Bay is considered to be a good location for the Museum, it does not have to be built over Britannia Park as nearby alternatives exist.

#### *9.1.1 The regeneration of Cardiff Bay within the LDP*

According to the LDP (A3.29)

*The regeneration of Cardiff Bay represents a major success story with major redevelopment and infrastructure projects being undertaken over the past two decades. Whilst significant progress has been made a number of sites remain to be implemented including the completion of developments at the International Sports Village and the media/creative industries cluster, residential development and associated uses at Roath Basin (Porth Teigr).*

With these major sites still not implemented, there can be no justification for building over one of the

few small green spaces within the Bay area, itself a product of an earlier regeneration that recognised its value. The LDP does not propose Britannia Park as a development site.

### *9.1.2 Porth Teigr*

The LDP (A3.29) recognises that the development of Porth Teigr has yet to be completed. Outline permission<sup>126</sup> was granted in July 2008 for a major regeneration of land to the southeast of Roath Basin. The application was submitted by Igloo Regeneration to redevelop former operational port land to create a mixed development of housing, business and commercial uses, open spaces and car parking, and entailing landscaping, new accesses and infrastructure, and land reclamation.

Progress was slow in the aftermath of the financial crash and in 2010 approval was granted to an application<sup>127</sup> to extend the period allowed for development from 3 years to 15 years. The freehold for this land is held by Welsh Government. But Igloo made little headway and in November 2018 Welsh Government (who own the freehold) took over responsibility for the 38-acre site<sup>128</sup>, of which 30 acres (12.1 hectares) were then undeveloped, but new plans have not yet been published. Porth Teigr includes the land on which the Doctor Who Experience once stood but that building has now been dismantled to be reassembled elsewhere. To my knowledge, no decision has yet been taken on the future of this site, which is already established as a cultural destination.

One of the arguments (DAS 2.1) for using Britannia Park is that “*the location of the building provides another cultural landmark between the city centre and the bay, promoting the use of this route and*

<sup>126</sup> Planning Application 03/00099/C

<sup>127</sup> Planning Application 08/01736/C

<sup>128</sup> [www.walesonline.co.uk/business/commercial-property/whats-happening-doctorwho-experience-15374330](http://www.walesonline.co.uk/business/commercial-property/whats-happening-doctorwho-experience-15374330)

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*drawing people further towards the Barrage*”. A Porth Teigr location would offer similar advantages and would take forward the regeneration of this land, without destroying an existing park. It may be potential to include parking there, at least for disabled visitors, which Britannia Park has no capacity for. As this is public land, Cardiff Council should speak to Welsh Government about MMM relocating to Porth Teigr rather than building on Britannia Park.

### *9.1.3 Alexandra Head*

Work was undertaken in spring 2018 to tarmac land on Alexandra Head for events, at a cost of over £1.1m<sup>129</sup>, initially in preparation for the Volvo Round the World yacht race. It was then used for the Bay summer beach, as the usual location on Roald Dahl Plas was required for the National Eisteddfod, but the headland proved not to be a very popular location<sup>130</sup> for the beach, which in 2019 returned to Roald Dahl Plas. Since then the tarmacked land has not been used. As a possible location for MMM, Alexandra Head would have the visual amenity of overlooking the Bay lagoon and would certainly draw people towards the Barrage. It is a less obvious alternative than Porth Teigr and some distance from other Bay attractions but a regular bus service over the Barrage is now under consideration<sup>131</sup>.

## 9.2 No masterplan for the Waterfront

There is no current masterplan for the Cardiff Bay Waterfront. In 2014 Cardiff Council, commissioned Urban Strategies to produce a masterplan<sup>132</sup>, with the aims:

- 1. Promote development and realise the full potential of the Bay particularly for leisure and tourism and as a visitor destination.*
- 2. Maximise regeneration opportunities having regard to local community need and aspiration, heritage, maritime history and historic character.*
- 3. Provide a vision and illustrate development opportunities for ongoing dialogue with local communities, stakeholders, businesses and developers.*

This abortive masterplan was abandoned<sup>133</sup> in 2016.

PLBP (7) returned to the need for this, stating that

*A strategic masterplan of the Bay will be developed to draw together all of the opportunities around the Bay edge to ensure that any development brought forward is appropriate in scale and nature and is set in the context of public open space provision and appropriate transportation linkages.*

No such strategic masterplan has been published. Without such a plan, no major development on the waterfront or on the park should be approved, as its implications for the area cannot be adequately assessed. Such a masterplan may well show that there are better sites to build this museum in Cardiff Bay than over Britannia Park.

<sup>129</sup> [www.walesonline.co.uk/news/wales-news/cardiff-spent-11m-tarmac-land-15930905](http://www.walesonline.co.uk/news/wales-news/cardiff-spent-11m-tarmac-land-15930905)

<sup>130</sup> [cardiffmummysays.com/cardiff/what-to-expect-at-cardiff-bay-beach-2019](http://cardiffmummysays.com/cardiff/what-to-expect-at-cardiff-bay-beach-2019)

<sup>131</sup> [www.bbc.co.uk/news/uk-wales-50159041](http://www.bbc.co.uk/news/uk-wales-50159041)

132 [www.urbanstrategies.com/project/cardiff-bay-waterfront-master-plan](http://www.urbanstrategies.com/project/cardiff-bay-waterfront-master-plan)  
133 [cardiff.moderngov.co.uk/mgIssueHistoryHome.aspx?IId=6929&Opt=0](http://cardiff.moderngov.co.uk/mgIssueHistoryHome.aspx?IId=6929&Opt=0)

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## 10 CONCLUSION

### 10.1 Planning Committee should reject 19/02506/MJR and 19/02508/MNR

This document provides evidence of the material considerations on which rejection of 19/02506/MJR and the associated applications 19/02506MNR could and should be justified and defended, including:

- A. The precedent of previous planning decisions from the initial creation of the park as a valuable open space through subsequent decisions confirming that it should be kept as such.
- B. The loss of green open space in a ward and local area that has an existing deficiency in this, in breach of LDP Policy C4 on protection of open space.
- C. The scale and dominance of the proposed building on a site at which it will reduce the leisure amenity of the remaining green space and the visual amenity of existing vistas.
- D. The extra demand this new attraction will place on local transport and parking facilities, with no provision for disabled parking.
- E. The design and appearance of the external material, which is inappropriate for a park with heritage features.

*The Planning Committee should fulfil its duty to Cardiff residents by rejecting both applications.*

### 10.2 Cardiff Council and Welsh Government should reconsider this proposal

Beyond the narrow remit of the Planning Committee, Cardiff Council and Welsh Government should reconsider the backing they have given to the project to relocate the Museum of Military Medicine to Cardiff since it was first suggested in 2015.

#### *10.2.1 Risk assessment*

The lure of bringing what could be a major asset to the city is enticing. It would contribute to Cardiff's standing as a European capital and should draw more tourists. The possible benefits to Cardiff Bay are also alluring: regeneration is still work-in-progress, the Bay has unrealised potential, and a new allweather attraction could bring visitors in all seasons. But issues spring up, once questions are asked

about the viability of this project. *No further support should be given to the Museum until a thorough risk assessment has been completed, with either Cardiff Council or Welsh Government has acknowledging the risks and committing to accepting any financial or other costs they may entail.*

### *10.2.2 Future of Cardiff Bay Waterfront*

The history of this proposal shows that Britannia Park was not the first choice for this Museum but a fallback when other options were closed down. This highlights the absence of a coherent vision for the future of Cardiff Bay, in particular for the Waterfront and for the large area of brownfield land to the south-east of Roath Dock, where regeneration has stalled. There is an urgent need, and has been for some time, for a new masterplan for this area.

Without such a masterplan, it is impossible to conclude that Britannia Park is the only choice for a large-scale project such as this Museum. Other land is available nearby, in public hands, that could benefit from such a development, without ruining what the original Capital Waterside proposal described as valuable open space. Building over Britannia Park, beyond the gravelled area, is neither desirable nor necessary. Cardiff Council should work together with Welsh Government towards a new vision for Cardiff Bay, backed by a credible masterplan, that would seek to develop vacant land to maximise the benefit to local residents, and to the wider Cardiff and Welsh economy and society. Until such a masterplan has been produced, the proposal to build a Museum of Military Medicine in Cardiff Bay should be put on hold. *Cardiff Council should inform the Museum Trust that it will neither sell nor lease land on the park for this, until it can assess the proposal against such a masterplan.*

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## 11 APPENDIX: MAPS AND PLANS

11.1 Capital Waterside Development Framework Plan (1993)  
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11.2 Britannia Park approved layout (6 April 1993)  
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	11.3 Britannia Park initially proposed layout (15 February 1993)	
Lynne Hughes	I have already set out my objections to the original Planning Proposal and my objections are still valid.	0 7
Julia Eynon	<p>I would like to object to the construction of a Cardiff's Museum of Military Medicine on the Britannia Parks. As a Cardiff resident for the last 38 years, I have witnessed and participated in no end of activities on Britannia or Waterfront parks. As a Chilean, living in Cardiff, I have invited many friends, Chileans and others from various European countries (like Czechoslovakia, France, Germany, Russia) and Japan, to mention some, to picnic in the well-maintained green area of the park and go to concerts at the Norwegian Church.</p> <p>The area of Britannia and Waterfront park is used by people from different areas of the UK. Picnics are organised, there are festivals like the Eisteddfod, Cardiff Food Festival and many other free activities from political and local community organizations. People love the green, the beauty of the Norwegian church, the waterfront. They can relax in a lovely environment, so clean, well-controlled led dogs and the grass so well looked after. The trees help to maintain the freshness of the area and, weather permitting, people sit on the clean grass. It is a pleasure to see children playing in a safe environment.</p> <p>The parks are used for recreation. Every year, the number of visitors and stalls multiplies at events, extending to the open area close to the Norwegian Church. Visitors of all ages, ethnicities, and social backgrounds.</p> <p>Evidence on the benefits of green areas</p> <p>Green areas are extremely important not only to counteract the effect of pollution, but for the general wellbeing of the public and local residents. Research from two Scottish scientists, Dr R. Mitchell from Glasgow University and Dr F Popham of St Andrews University conclude that a bit of greenery near our homes can cut the "health gap" between rich and poor. In all parts of society, the researchers found health inequalities related to income and social deprivation, and in poor areas people are likely to be unhealthier and die earlier. Nonetheless, the researchers found that living near parks, woodland or other open spaces help to reduce inequalities, regardless of social class.</p>	0 8

Other studies suggest that contact with green spaces also helps to reduce blood pressure and stress levels. The two and other scientists made a call to planners from councils to consider making more green spaces available to the public and local residents in order to improve wellbeing and good health. (Article published in the scientific magazine The Lancet, 2008).

Further information on Health and sustainable development at [www.who.int](http://www.who.int), and on Green Space intervention and health (2017) at [www.euro.who.int/Urban](http://www.euro.who.int/Urban).

We cannot ignore the importance of a green space like Britannia Park and its use by local residents from the flats nearby and visitors. Most of the flats do not have balconies, just windows, and some residents have been advised not to use their balconies because they will be in danger of accidents.

Issues with Corten steel

The urbanisation of this piece of land, important for locals and visitors, would create enormous health problems, because of the materials used in the design of the building. The use of Corten steel cladding will create a new type of pollution, not seen until now in this area of the Bay.

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I would like to bring your attention to some extracts from professional articles and information:

#### 1. Why Corten steel is a Nightmare

COR-TEN is a trademark of the United States Steel Corporation. The idea behind this striking material is that a surface layer of rust will form, protecting the steel underneath from further deterioration and eliminating the need for paint. However, the development of this layer requires particular environmental conditions which can't be guaranteed.

When the metal gets wet and then dries out, the rust layer becomes a little thicker, while the underlying solid steel becomes thinner. In an ideal world, the rust layer would continue to take hold of the steel for two or three years before stabilizing. The result should be a maintenancefree material with a unique aesthetic.

But in the real world, different conditions like too much humidity often mean that the rust layer never reaches a stable point. Eventually, the metal can become perforated and may need to be replaced.

Author: Ali Emerson ([aliemerso.com](http://aliemerso.com)) who is a writer with many years of experience in education and a trained Forest School Leader.

More information at <https://greenfuture.io/sustainable-living/corten-steel>

#### 2. Weathering steel, or Corten steel, is a potential source of contamination:

Metal dissolution during 3 – years of field exposure in an urban coastal site. Surface and building run-off can significantly contribute to the total metal loading in urban runoff waters, with potential adverse effects on the receiving ecosystems. The present paper analyses the corrosion-induced metal dissolution (Fe, Mn, Cr, Ni, Cu) from weathering steel (Cor-Ten A) with or without artificial patinas, exposed for 3 years in unsheltered conditions at a marine urban site (Rimini, Italy). The influence of environmental parameters, atmospheric pollutants and surface finish on the release of dissolved metals in rain was evaluated, also by means of multivariate analysis (two-way and three-way Principal Component Analysis). In addition, surface and cross-section investigations were performed so as to monitor the patina evolution. The contribution provided by weathering steel run-off to the dissolved Fe, Mn and Ni loading at local level is not negligible and pre-patination treatments seem to worsen the performance of weathering steel in term of metal release. Metal dissolution is strongly affected by extreme events and shows seasonal variations, with different influence of seasonal parameters on the behaviour of bare or artificially patinated steel, suggesting that climate changes could significantly influence metal release from this alloy. Therefore, it is essential to perform a long-term monitoring of the performance, the durability and the environmental impact of weathering steel.

Authors: Raffo S, Vassura I, Chiavari C, Martini C, Bignozzi MC, Passarini F, Bernardi E. Full article at <https://www.ncbi.nlm.nih.gov/pubmed/26995453>.

### 3. US Steel does not recommend Corten

US Steel hasn't recommended corten steel for "architectural application[s], such as roofing and siding" for the past two decades. The reasons given are that abrasion from weather and acid rain cause the oxide skin on the material to reform, which causes the material itself to eventually become perforated. Can we justify using materials that we know may need to be replaced in the near future? More information at <https://www.ussteel.com/products-solutions/products/cor-ten-azp>

Why does a project like the Museum want to use a material like Corten for the structure of their building, that will be a potential health hazard for the public, sea life, and the whole environment? It is contrary to all principles and policies from Cardiff City Council, the Welsh Assembly and various environmental groups.

Why destroy this green area?

Do we need to urbanise this area of Cardiff Bay, which will destroy the local only green area, so much used by local residents (who often live in flats, without access to gardens), schools, and visitors from Wales and other countries, like my friends when

they visit us? There are other areas in the Bay and Cardiff already urbanised, like the grounds of Maindy barracks.

What is the justification for using land where, in 2017, we fought the construction of a 24 floor luxury flats? This opens questions. If you urbanise the land and put a Museum, and then the Museum goes bankrupt (64 museums in the UK have been closed since 2010), what will happen? Who will own the already urbanised land? Will the company who wanted to build the luxury flats move back in?

Scott Brownrigg, who designed the Museum, do not disclose its total construction cost, although some sources say £30 million. Where will the money will come from? Cardiff Council is apparently £730 million in debt. How could the Council justify spending our tax money to destroy the only piece of local land so much needed by local residents and visitors. Surely at election time our voices should be heard.

The Museum de Amambra in Brazil, not a technological museum, cost £40 million in 2015, and because of the effect of 'Tower Inferno', a museum fire lost 80% of their artefacts. They could not afford the most basic money for maintenance and their budget was smaller than the money received by a parish church.

The Museum you want to build will, according to the BBC, be a highly technological one. Could you please tell me who will pay for renting technology, training staff, insurance, renewal of technological equipment, or other running costs like electricity? None of this information is available, but instead just the illusion of copying a Museum in the city of Linz, a museum with more than 40 years of experience and development in technology.

None of this makes sense, so I will ask again, are you preparing Britannia Park for the future construction of the luxury flats, that local people stopped in 2017?

Not a priority

I do not oppose to the project of another Museum in Cardiff, if the money comes from military budget, not the public purse, on their own land, and not in the only green land so much in demand by local people and visitors.

Why on earth would the Council want to spend public money on an illusion of more visitors, when homeless people are increasing in number and sleeping rough is a painful scene in the city? The Museum of Wales in Cardiff, that has hundreds of visitors from all the region and abroad, cannot build proper access for disabled and pushchair to win access to the entrance. Why are you going to spend an undisclosed amount of millions in a project that will damage the environment, pollute people's lungs, poison the water, would restrict people's movement, and stain with rust other buildings in the

vicinity, while the weight of a five store building will affect the foundation of any building in the vicinity? A well-used green area will be lost for ever.

The construction of the Museum will create enormous difficulties for future activities in the area, I have many years' experience of community work, as an organiser and in women's organisations. When you stop or distract an activity you destroy it, and the public will move to different venues, in other cities or areas. Financial consequences will be enormous, affecting not only well-established local businesses, but the creation of future successful activities that will generate income for Cardiff.

The company Scott Brownrigg do not give a time limit for the construction of the Museum, and do not disclose a total cost, and no one tell where the money will come from for this project. This is enough time to kill participation from visitors, festivals and use of the area. Anyone who has watched Grand Design knows that, and here we are talking of a large project. When you start a project of this magnitude then you start to find obstacles. So the time schedule will be greater than predicted. The cost will escalate, and who will pay? I think politicians should pay by not being elected.  
Damage to green area.

The green area in Britannia Park and Waterfront Park is a centre for life and creativity. As a member of women's groups, we organised there many open workshops for families, teaching adult and children activities. Currently, the area is used for music, picnics and stalls, and general leisure activity. The centre point of this is the Norwegian Church, and its open surrounding is a vital attraction. The pub in the vicinity of the park, is a social meeting point for community groups as well as local residents. Concerts, lectures or any other activity at the Norwegian church, will be less popular, and the wood and timber structure of the church will be stained by the rust of the Corten steel. A building of five floors creates strong winds blowing rusty dust and affecting people's health and who will be liable for the costs of correcting this damage? This will kill activity in the church and in the area. A new building of this magnitude will create enormous demand for parking spaces. The illusion that people will go by other form of transport is a dream. You only need to see the amount of cars that Xmas shopping generates.

As a tax payer, and user of Britannia and Waterfront Parks, I object to using this green area for construction of this five-storey building. It is insensitive to support a Military

	<p>Museum in a harmonious area. The war in Iraq, or incidents such as when a US bomb killed 30 Afghan people going to a wedding, are too fresh in our memory. It would be a lack of sound judgement to display the consequences of cluster bombs thrown by UK planes on civilian populations in Iraq. The Museum in the Bay area will be a constant reminder of wrong political-military interventions in the Middle East. Construction and disturbance in a well-settled area is going to create a financial hole in council and local business income, and the loss of a green and unique park for ever. We, the public, are not prepared to accept this landscape vandalism. Building on brownfield sites would not affect people's well-being, and there are many in the Bay. The open space in Britannia and Waterfront Park is part of the right of people to have the enjoyment of green areas, clean and fresh air and a safe environment where people can enjoy a healthy unpolluted area, free of traffic noise and transport fumes. So your project should not interrupt the continued right of people to use Britannia Park green areas.</p> <p>The Council has bought the land of Britannia Park with our tax money, and the Council should be the custodian of this land for the use of recreation for the people. As the research of the two Scottish University, the WHO and other scientists shows, green areas are good for active and mental health of the population, so we should keep it.</p>	
<p>Dr David Phillips</p>	<p>I wish to object to the proposed Museum of Military Medicine on the site of Britannia Park in Cardiff Bay.</p> <p>Recent planning applications in relation to the same site have been turned down – as I understand it – predominantly upon the basis that such buildings on the proposed site would rob the residents of Butetown of vitally necessary green space in Cardiff Bay. Ever since I was active in objection to the construction of a very tall block of apartments on the same site I have –over the last 18 months carefully reviewed – practically on a daily basis –the use of the green space in question throughout the changing seasons of the years. By way of background, we have a disabled daughter and we very regularly – indeed almost daily – walk the barrage to Penarth and back. This is a wonderful flat surface amenity which we have greatly valued since our return to live in our native Cardiff after some 35 years living and working in London.</p> <p>During the spring, summer and autumn I have – with some considerable satisfaction –noted that both the green space and the children's play area have been used by many residents and visitors. It is a joy</p>	<p>O 9</p>

to see the many happy faces using such a wonderful amenity. My daughter often sits – with considerable pleasure

– in her wheelchair in the green space

watching the world go by – a great environment for her to see, hear feel and smell an open space- with people enjoying it within the confines of a busy city

To my knowledge there is no other such space in Cardiff Bay.

Cardiff is blessed with a large amount of green space and we often drive some distance on a regular basis to enjoy the pleasure of walking around Roath Park Lake – which is a delight not only to us but to our daughter , Rachel as well.

She really loves the Bay though and delights in seeing – for at least two thirds of the year- the many people enjoying the green space amenity and the recently upgraded children’s play area.

To lose this would be a tragedy – especially given the focus of public opinion and national newspapers in relation to the loss of such areas In my view putting a medical museum on that site would be sacrilege since it would deprive residents and visitors alike of a lovely increasingly rare green space so enjoyed by the many. Indeed I think that the Cardiff City planners over the years have played a seminal role of expertly planning the whole of the Bay area. Many of the visitors to our apartment have commented on the wonderful totality of this great amenity and how its architecture has seamlessly integrated both the new with the old – and they have enjoyed the visual experience

As a Cardiff resident who lives in an apartment such amenities are vital since we have no personal garden space available. On the face of it there seems to be little to commend a somewhat ugly building to be placed in such an area There also seems to be little need for a military medical Museum within an area that is primarily people focused as it is.

There may be good reason why this medical museum should be situated in the Bay in Cardiff and if this can be shown and proved to be a viable proposition a cursory glance of the aerial view of the area indicates that it could be placed, for instance ,on the other side of Harbour Drive –much nearer the Port authority building which could easily be afforded ample car parking – very deficient within the bay area generally and the area in question specifically . It would also allow easy access on a revived bus route. Such a facility in that position could well be a welcome addition to the Bay and yet not be a detraction from as to me present position of the proposed museum would be. indeed, the problematic architecture of the museum would be much better suited to such a site given the buildings already in the vicinity

	<p>The planners of the Bay could then perhaps usefully propose a small low- rise discreet innovative construction on the gravel covered site utilising it in the best interests of visitors and residents alike which would be in keeping -as a family friendly area</p> <p>I think to do this as an alternative could then balance the needs of the developers and owners of the land to build- with a human perspective in clear focus,mindful of the needs of residents and visitors to the Bay- and of course their own- in that it would retain both green space and children's amenities which are readily available at present and would be sorely missed.</p> <p>I would be grateful therefore if you would place my objections before the relevant Authorities</p> <p>I would also be grateful if you could acknowledge receipt of this email since it has been difficult to find the right avenue to easily ventilate objections I would also be pleased if you could give me the result of the deliberations in due Course</p>	
J & B Miller	<p>We are writing to object to the above planning applications to establish a Military Museum of Medicine in Britannia Park. We are frequent visitors to Cardiff Bay and very much enjoy walking over the Barrage from Penarth to utilise the various facilities in the Bay including the green area around Lockkeys Cottage and the Nowegian Church.</p> <p>It would seem a great sacrifice for the people who live and work in the area of the Bay to lose the Green area for walking and relaxation, not to mention the urgent need for more green areas and trees with regard to the threats from climate change which requires urgent action by all responsible for public funding.</p> <p>It is also of great importance to the physical and mental health of the local communities, workers, residents and their families to have the opportunity to exercise in this limited green area.</p> <p>Britannia Park and other green spaces in and around Cardiff need to be protected and retained for the above reasons. Please - do not grant planning permission for this application and retain this precious facility for the many rather than the few who may have an interest in this Museum.</p>	1 0



<p>Mr and Mrs Westermarck</p>	<p>Dear Sirs</p> <p>We strongly object to the granting of planning permission in regard to the above planning references. Our objections mirror concern expressed on previous planning applications for Britannia Park, principally</p> <ul style="list-style-type: none"> <li>* loss of precious open space (a scarce resource locally) that provides many benefits to local residents</li> <li>* the negative impact resulting from increased traffic and parking congestion</li> <li>* the negative design and visual impact of a 5 storey edifice in the park area Furthermore...</li> </ul> <p>Why does the Museum have to be in Cardiff and why in the bay? What is the business case (hard numbers)? What is the vision and strategy for cultural centres? Should there be a cluster of such entities? Where should this cluster be?</p> <p>Vision and Strategy</p> <p>The fact that the authority is even considering these applications confirms the lack of an appropriate vision and strategy for the area (Cardiff too?). When there is clarity the correct decisions are easily and quickly made at minimum/zero cost.</p> <p>When it is established that Britannia Park and environs is a 'no go' zone then you have this clarity. We strongly believe that there is no case for your approving these two applications.</p>	<p>1 1</p>
<p>Sarah Lucas</p>	<p>As you are aware there is very little open space within Cardiff Bay, especially when considering the amount of people who frequent the area throughout the year. There is plenty of brownfield space located such a short distance away yet this application is being considered for space that is already used and occupied. It seems absurd that this application is even being considered when the other space is currently unused and in need of regeneration. This area is already in use, and adds to the whole ambience of the Bay. The loss of the open space would make the Bay feel overwhelmed, cluttered and we would lose something extremely valuable that we would not get back - space.</p> <p>The application is also for a 5 storey building which would completely overwhelm the small amount of green space that is located next to the site, completely changing how this space will be used (this is currently used by families to sit and enjoy time together). The green would be cast into shadow. This would also overshadow the iconic Norwegian Chapel, a building that has been at home in the Bay for 150 years.</p> <p>I also object to the fact that the application has not dealt with the issue of the number of visitors that this proposed museum will supposedly attract. No parking has been allocated and</p>	<p>1 2</p>

	<p>the application seems to instead utilise already overwhelmed local parking structures as well as inadequate public transport. This is unacceptable.</p> <p>Also I fail to see the relevance of this proposed museum as it has no link to the area it intends to occupy. There is absolutely no reason that this should be sited here. There are no links for the museum to the Bay. An alternative location which would be much better suited should be sought.</p> <p>I find it ridiculous that in sight of the Welsh Government building we would be losing such valuable public open space. The Bay attracts the amount of visitors it does in part for it's aesthetic appearance and family-friendly space.</p> <p>As Lock Keepers Cottage is a listed building and forms a pair with the other cottage it would be terrible to lose a part of Bay history. The Bay's charm in part is due to the mix of retaining some local history whilst new useful space is integrated. We run the risk of losing all history of the Bay. Again, how can this be considered?</p> <p>I look forward to these planning applications being reconsidered and the Planning Department overturning the proposals. We can do so much better than this Cardiff Council! We should have a Bay we are proud of and safeguard this for future generations. This land should be out of bounds for planners for good.</p>	
Prof. Olliver Williams	I am writing to voice my objection to the above planning applications. I am particularly concerned that I have not seen clear notification displayed on the site. The idea to build on such a small area of space is objectionable when the area is surrounded by unused brownfield sites. This is an important space in the bay for families, children etc. I am also concerned about inadequate parking and traffic being further exacerbated. I object in the strongest possible terms, please stop trying to build on this area,	1 3
Howard Williams	<p>am astounded to have to write yet again about proposed new developments on the Britannia park on Roath Lock. After a long debate and a series of protests by the local community a proposal for a huge block of residential flats on the same spot was turned down.</p> <p>It is surprising to see this new plan appearing so shortly after the last plan was rejected. The major objection I have to the plan for the Military Medical Museum is that will take almost as much ground space as the previous proposal. The children's playground - which is very popular will disappear and the majority of the green space itself. How can this represent an improvement and a better use of the land. Green</p>	1 4

	<p>space in general is in short supply in the Butetown area. In the summer local families gather on the park to celebrate the fine weather and enjoy the waterside view. With the new plan this possibility will disappear for ever.</p> <p>The proposal fails to take into account that much of the nearby area is residential. The housing that exists does not afford much opportunity to get out into the open and enjoy nature. Having Britannia park to hand in its present form is essential.</p> <p>It is a duty for the council to come along with a plan for the small building plot near the park that it now owns that fits in with the present excellent facilities. Surely there are many more appropriate spaces in the city to cite the medical museum - it the council decides that the museum is at all a viable enterprise to host.</p> <p>One final objection I would voice is to the rapid speed with which this idea has been pursued. The general election on December 12 holds the attention of concerned citizens. It would have been appropriate to schedule any decision until after that occurs. At worst a decision should be postponed and best of all the whole plan should be rethought</p>	
Julie P Meridith	<p>As a resident of Cardiff Bay I object to any building on the green space Britannia Park.</p> <p>2 years ago ago there was a huge objection to buildng apartments there and there is no difference to the building of this so called Museum. It will not benefit the Bay at all. This is the only green space, with trees, from the Wetlands to the Docks and is a welcome oasis in the paved concrete area that has become Mermaid Quay/ Bay and is a welcome space for locals and visitors alike, especially with children, to play on grass!</p> <p>To lose this for a loss making Medical Military Museum is stupid! Even the popular Dr Who Experience didn't survive and has now been demolished. In 5 years time I don't want to see another derelict abandon3ed building where once chilren played.</p>	1 5
Clive Gaitt	<p>I wish to object to the above planning applications.</p> <p>While further regeneration of derelict areas of Cardiff Bay would be welcome, the applications to construct a Museum of Military Medicine (MMM) and relocate Lockkeys cottage are inappropriate on this small but important site in the Bay.</p>	1 6

My main concerns are the loss of public green space, the scale of the proposed building and its impact on adjacent cultural and heritage buildings.

Of prime importance is the fact that Britannia Park is one of the few open green spaces in this part of the Bay. It is of great significance to the local community. Britannia Park has established use by families living nearby, workers from offices in the vicinity and visitors to the Bay. It is also used for events. Although small, it is a precious facility, much valued as evidenced by the weight of objections to previous development proposals. The site is unsuitable for the proposed MMM which would have a negative impact on the enjoyment which Britannia Park currently offers.

The proposed structure is far too large for this site. Architects' impressions make an attempt to minimise the apparent bulk with the emphasis on glass, but the fact remains that it will be overbearing and cast a shadow (in more senses than one) over what would be left of the open space. Out of scale, it cannot be successfully integrated into its setting and in no way would it enhance the public area.

Adjacent to the site is the Norwegian Church, a significant local feature which embodies cultural links with Norway. The proposal has no respect for this important neighbour, which would be dominated by the MMM. Lockey's cottage is of historical significance and has relevance in its current setting. It should not be relocated.

Why does Britannia Park come forward yet again for isolated over-development on an unrealistic scale? Better quality development would result from coordinated planning of both sides of the lock which could offer an integrated scheme of modest scale and should include the urgent rehabilitation of the lock itself and removal of the bund.

It is difficult not to be sceptical about the arguments put forward by the developer as to the viability of this project. On the one hand the MMM is promoted as being of wide interest, attracting huge numbers of visitors to the Bay, but on the other hand no special provision is deemed necessary to cope with this influx.

If Council are convinced that MMM should be welcomed to Cardiff, the applicant should consider alternative sites, several of which exist in Cardiff Bay. Far more appropriate is the empty site at Porth Teigr, opposite the BBC complex, adjacent to Igloo, or indeed the Doctor Who site, recently left vacant.

	What open public space, playgrounds and trees we are lucky enough to still have should be protected by Council as a matter of priority. Britannia Park is too important to the local and wider communities and I call upon Council to refuse these planning applications.	
Ruth Abbott	Please put it somewhere else! There is nowhere in the bay for children to play. We do not want tall buildings blocking our view	1 7
Mr R Stephens	I am hereby objecting formally to the subject proposals set out above. Having recently objected to the development of Britannia park I find the proposal to the destruction of this small area for a museum that has no connection to Cardiff bemusing and is to me is a form of English "fly tipping". Why does the land need regenerating just mark it as a park for both adults and children. My key objections are for the most part similar to those objecting to the previous proposal and are as follows; Loss of open space. Insufficient Transport and Parking Incongruous Design and visual impact. Why knock down a genuine historic part of the docks and move it - waste of my taxes. Financial viability. it is essential that the annual returns and running costs for the current museum which I understand is situated within an army barracks thus reducing overheads be submitted to all objectors. I have genuine doubts as to the expected number of visitors that would be drawn to such a museum. I am a resident of Adventurer Quay within the Bay so the impact of the proposal affect me directly.	1 8
Ossie Wheatley	I object to the Museum of Military Medicine (MMM) on the following grounds: 1) When ABP withdrew their application for Dolffin Quay development in 2017 the local community believed that Cardiff council had accepted the necessity to retain Britannia Park as a Green Space. It is disappointing to see the Council encouraging MMM to make this application on ground owned by the Council! 2) LDP policy KP10 supporting tourism in Cardiff Bay states: "by improving the range of sporting, recreation and leisure facilities, the area is made a more attractive place in which to live, work and visit". How does the removal of 50% of the Green Space meet this aim? 3) The City of Cardiff is already well down the league of cities offering parks to their residents, viz: Cardiff parks offer 8.04% of the City compared with Birmingham at 15.58% 4) The MMM scheme means chopping down mature trees in times of climate change pressures 5) Projected visitor numbers vary between 225000 and 250000. From where do these figures come? Techniquest gets only 189000. The Medical Museum on Washington CD get 50000! 6) Car Parking. If the visitor projections are right and half the visitors come by car, as suggested -	1 9

	<p>where do they park? the Application asserts there are "numerous car parks". Where are they?</p> <p>7) Bus routes. Obviously the No6 bus would be reinstated but even with this help it is worth pointing out the council lost £1.1m supporting DR Who together with the No6. Would the MMM have greater "pulling" power?</p> <p>8) The design of the MMM is described as of "floating industrial form with north lights". This is claimed to link up with the industrial past! In reality this is not an appropriate structure to place by the sea as it would overshadow the small park and children's playground.</p> <p>9) Linz, Austria, Museum of the Future. A recent PR release describes an elaborate project at Linz costing £30m but does not say which elements would be included at Cardiff. It is very difficult to interpret what the Trustees of the MMM intend to do.</p> <p>10) " A Transformational world Class Development in Wales" -another PR release- makes an extraordinary claim that Wales would be at the forefront of UK innovation in healthcare. Can this be right bearing in mind, for example, the £370m facility for Military Medicine and Rehabilitation at Stanford Hall financed by the MOD and the NHS?</p> <p>11) Irreplaceable site - the 50% of Britannia Park is a very important green space for local families and cannot be replaced. Whereas there are other alternative sites where the MMM could go e.g. the former Dr Who site, or on the south side of Roath Basin, where there is any amount of room</p>	
Lisa Power	<p>I strongly object to the plans to build a very large and unsightly building smack on part of the only free attraction left for families in the Inner Bay - Britannia Park.</p> <p>There are many other more appropriate places that this building, if we must have such a Museum, could be placed within Cardiff which would not destroy part of a park and blight the rest by putting it in shadow throughout the day. A five storey building placed where it is planned will overshadow the Norwegian Church in visual terms and place what is left of the park in shade, making it a far less welcoming place. The plans also appear to take out the children's play area and destroy the majority of healthy trees on the site. This is completely in contradiction to Cardiff's commitments to green space within the city.</p> <p>Furthermore, no provision has been made for parking by visitors who are expected to attend, when we all know that parking is impossible around Mermaid Quay and the Inner Bay throughout the summer in particular. The application claims there are "numerous car parks" - try telling that to the cars which cruise around each summer looking for somewhere to park when the little two storey place in Mermaid Quay is full. No others are considered nearby enough by them and illegal</p>	2 0

	<p>parking is frequent.</p> <p>The building, for all the fancy words used in the paperwork, is simply ugly. As the daughter of a sheet metal worker in a steel factory I can assure you there is nothing romantic or aesthetically pleasing about rusted steel, no matter how fancily you talk about it.</p> <p>The previous visitor attraction on this site was single storey and had a substantially smaller footprint. It didn't obtrude and overwhelm as these plans would.</p> <p>It is incomprehensible to me why we should have a glass and rusty steel five storey box shoehorned into an already busy part of the Bay, which damages an area used by families for relaxation, when so many empty non-green sites are nearby. Literally a stone's throw away is the empty Doctor Who Exhibition site; many more brownfield sites are close by.</p> <p>While on that subject - the visitor numbers projected are sheer fantasy and bear no relation to reality. Neither Techniquest - supported by many school parties - or the Doctor Who exhibit - supported by free advertising in every episode of the most popular children's show on British TV - could attain these numbers. Were I to believe them, I would be even more concerned about the parking issues. It will be broke and empty in well under five years, an eyesore on the landscape and another white elephant for Cardiff Council to own to - and considerably harder to dismantle than the Doctor Who structure.</p> <p>In short, this proposal is a mess, already rejected by several other more sensible cities, shoved out of its last proposed site by the desire for a giant leisure centre and its design completely unreformed to fit into the new surroundings. Please don't do it.</p>	
G Frank Trott	<p>I wish to object to Planning applications 19/02506/MJR and 19/02508/MNR regarding the above. I am at a loss to understand why there is this insistence on removing this last piece of open, accessible ground left in the area where families can spend quality time together in the fresh air. I must declare a vested interest. I have three grandchildren who live in London and visit us regularly. EVERY time they visit us, we spend time walking in and around the proposed area. In the summer we have picnics on the grass adjacent to The Waterguard and my six year old grand-daughter loves playing in the park. Why onearth deny people simple pleasures when there are bound to be more appropriate sights available eg. I am led to believe that initially this was proposed to go in the open space by the Travelodge Inn. A five</p>	<p>2 1</p>

	<p>storey building thus situated would in no way stand out like a sore thumb as it would in the above planning applications.</p> <p>Please do not proceed with either of the above applications. I'm an old man, but I'm more than willing to fight this on behalf of my grandchildren.</p>	
Bryan Dash	<p>I am writing to object to the two above applications. My concerns are as follows :-</p> <ol style="list-style-type: none"> <li>1. The area being considered for development is the only green area in the region close to the activities which take place in that area of Mermaid Quay. The lawn and the children's play area are regularly used by visitors, particularly in the summer.</li> <li>2. The thought of a five story box, for want of a better description, being built there is absolutely abhorrent. I should explain that I live in Adventurers Quay and although not directly in line with it, it will certainly block my view of the waters of Cardiff Bay when looking out of my windows or sitting on my balcony. The thought of the current area and some trees being lost forever saddens and infuriates me.</li> <li>3. In addition, once again a developer wants to destroy yet another link with Cardiff's long history in the Docks Area by demolishing the Lock Keepers Lodge. Not forgetting that Captain Scott sailed from near there on his historic journey.</li> <li>4. Finally, where will visitors park their cars as there is only limited space available. In addition there is no longer a bus service passing along Harbour Drive.</li> </ol> <p>I do hope that you will seriously consider my objections as the development will do nothing to enhance what is currently a very pleasant area for people to enjoy.</p>	<p>2</p> <p>2</p>
D G Rees EM Rees	<p>We wish to log our objections regarding both the above applications.</p> <p>Our objections include :-</p> <ul style="list-style-type: none"> <li>Loss of open space</li> <li>Transport and parking</li> <li>Design and visual impact</li> <li>Locky's cottage</li> <li>Use of public land</li> <li>Appropriateness of this location</li> </ul> <p>Creating more Green Spaces is a priority in Wales and Swansea is taking the lead !</p> <p>Let's try and do our best here in Cardiff Bay to protect what little we have !</p>	<p>2</p> <p>3</p>



	<p>Our aim surely, is to preserve not destroy green spaces. There are far more adapt locations in Cardiff. Please do not spoil our "little bit of green"</p>	
<p>Faisal Jina</p>	<p>My first objection is in the form of lack of notification to local residents "there were no leaflets distributed, no (clear?) notices near the site, and this has largely been kept quiet from the press, aside from the obligatory small print notice in the back of the Western Mail. I think the public ought to be made more aware of this prior to granting permission, given the site's importance. Secondly, the Government launched its Climate Change Blueprint this week, which promises more green open spaces in our cities, yet this plan builds on one of the few green open spaces in the bay, within a stone's throw of the Welsh Assembly" I think it would be massively hypocritical to approve this development.</p> <p>Currently, the public can walk along the water and enjoy the open space that Britannia Park offers. Many local residents and workers regularly use the green space for picnics, especially during summer time, and enjoy the open view of water and land throughout the year. There is an everreducing amount of suitable green space in the surrounding areas, and this would significantly reduce the amount of green space available to the public.</p> <p>The plans released include a 5-storey building situated adjacent to the Norwegian Church. It is clear that a structure of this size is not appropriate for the area, hiding and detracting from the historic church building, and spoiling the character of the area. It is also not acceptable to move the Grade II listed Locky's Cottage just because it is "in the way" of this massive development. It is an old building with clear cultural significance at this site and relocating it to a side could also easily damage it.</p> <p>The shadow tracking study shows the proposed museum would plunge Britannia Park into shadow through most of the day throughout the year. Looking at the midday tracks (as lunchtime is when the park is most used), the best-case scenario puts half of the park into shadow in June, and throughout the rest of the year the entire park will be completely in darkness. This is unacceptable. For those who actually appreciate the heritage of Cardiff Bay, the former use of the site was for 'The Tube' museum - a 1 storey museum sitting on the gravelled area of the proposed site. This was a suitable scale of building for the site, with a local theme. The planned museum would take up an area three times this and would be five times taller. A museum 15 times larger than its predecessor is massively out of scale. It is also concerning that the proposed boundary line of the plan extends over a quarter of Britannia Park and entirely over the play park - this is beyond the boundary of the drawn buildings, with no justification given. This should be</p>	<p>2 4</p>

	<p>rejected, as there is no good reason for destroying 12 of the 21 trees at this site. The design of the building is also ill thought-out. This is a building plan suitable for its original planned location at Hemingway Road/Lloyd George Avenue. The fact that it has had minimal redesigning from the previous plan shows that this has not been thought through. The 'box in a box' design leaves an ugly brick (/copper?) wall facing the water on the North-East (Roath Dock) side. The dock is frequently used and enjoyed by visitors and residents throughout the year for its views across to Penarth, which is a key sightline in the bay - not only does this building proposal block that sightline, but it puts a 5-storey wall in the way. This would have been the back of the museum in the original plan, masked by trees etc, but at this location it is in full view - this issue needs addressing. In conclusion, aside from the insufficient notice given to locals, and the need to move the Grade II listed Locky's Cottage, which simply should not happen, this proposal would result in:</p> <ul style="list-style-type: none"> <li>- a contradiction of the Government's own Climate Change Blueprint (launched this week!) - a significant loss of green open space - the destruction of healthy trees and the children's play area - detracting from the culturally significant Norwegian Church and the spoiling of the character of the area</li> <li>- a permanent shadow being cast on Britannia Park</li> <li>- a building massively out of scale - 15 times larger than its predecessor</li> <li>- a poor design - need to rethink materials and view from all sides</li> <li>- the loss of key sightlines between the Bay and Penarth</li> </ul> <p>For these reasons and more, I urge the planning committee to reject the proposal.</p>	
<p>Nerys Lloyd Pierce</p>	<p>19/02506/MJR</p> <p>*The construction of the Museum of Military Medicine will result in a loss of green space in an area of the city where very little green space exists. The claim that a relatively small area would be lost is unjustifiable. The Butetown ward is identified as having a deficiency of open space. At a time when obesity is a huge problem, causing more cancer than smoking, eroding any green space cannot be justified. Furthermore, Cardiff Council has a legal obligation to provide open space. The above application, if approved, would result in an unacceptable loss of open space. Planning application documentation dating back to the early 1990s exists, proving categorically that these areas were designated as public open space. Indeed, the provision of these open spaces was the premise upon which planning permission was granted for the redevelopment of Cardiff Bay.</p> <p>The open space provided by Britannia Park in its current form provides an invaluable open, recreational area where children can play – a vital resource in a part of Cardiff where apartments without gardens predominate. Exercise is vital for the health and well-being of children, and indeed, the population as a whole, as outlined in the Welsh Government's Well-Being of Future Generations (Wales) Act 2015.</p>	<p>2 5</p>

	<p>The loss of trees, when Cardiff Council has declared a Climate Emergency, cannot be justified. Trees are our frontline defence against the effects of a warming climate, and we should be preserving our mature green infrastructure not compromising it for the sake of an ill-considered development.</p> <p>*The proposed development site is in close proximity to an EU designated site (SAC, SPA RAMSAR sites). A Habitats Regulation Assessment ("HRA") is required by law. Failure to carry out such an assessment indicates that the applicant has failed to comply with EU law to protect coastal/estuary wetlands. (furthermore, it is the duty of the Council as competent authority under the EU legislation to comply with this legal requirements). *There has been no provision made for public transport or parking for visitors – according to the applicant, some 225,000 per year.</p> <p>*The structure of the building is inappropriate to the location. At five storeys high, it will overshadow both what remains of the park, and the Norwegian Church.</p> <p>19/02508/MNR</p> <p>*The Grade 2 listed Locky's Cottage should remain in its current location where it has context and significance. The only justifiable reason for relocating an historic building is to preserve it. Relocating it to make way for development is deeply inappropriate. Relocation of Locky's Cottage would affect its character as a building of historic interest. It is a common misunderstanding that the special interest of a listed building lies only in its features, this interest extends also to its history and context. British Listed Buildings describes Locky's Cottage as 'an interesting survival from the port and for group value with Roath Basin sea lock'. Removed from Roath Basin, its historic significance would be lost. For the above reasons, both these applications should be refused.</p>	
Janet Barlow	<p>As a local resident I object to this development.</p> <ol style="list-style-type: none"> <li>1. It will significantly reduce the open space of Britannia Park, a vital green space in the Bay, especially for the many residents like me who live in small flats and for the children who live in and visit the area.</li> <li>2. It makes no sense to build on the park when there is ample brownfield land close by already scheduled for development.</li> <li>3. The museum is not a good fit for the Bay. There is no historical link with the areas and it will be out of place with its surroundings.</li> <li>4. The proposed relocation of the Lock Keepers cottage to accommodate this proposal is unnecessarily down grading the Bay's heritage.</li> </ol>	2 6

Janet Jones	<p>I wish to register my objection to these applications (19/02508/MNR and 19/02506/MJR) on the following grounds:</p> <ol style="list-style-type: none"> <li>1. The loss of green, open space. The area is deficient in open space and this development would destroy some of what little there is.</li> <li>2. Transport and parking. Has any provision been made for the projected visitor numbers? Parking is already an issue and with more visitors to the area this can only get much worse.</li> <li>3. Visual impact. The proposed building is out of proportion for the site and would change what is currently an attractive area into yet another architectural eyesore.</li> <li>4. Location. Why is this project proposed for Cardiff and for the Bay? Other Welsh cities would welcome the investment a visitor attraction could bring. Cardiff Bay doesn't need or want it.</li> <li>5. Alternatives. The site of the Dr Who exhibition could be used for development and Porth Teigr still remains an unattractive piece of wasteland despite planning permission for mixed use.</li> </ol> <p>I hope these misconceived applications are rejected and that the future of Britannia Park is assured for the enjoyment of Cardiff families and visitors.</p>	2 7
Mary Davies	<p>I wish to lodge my objection to the above two planning applications. I am a resident of Adventurers Quay and as such this proposed development will have an impact on my close environment.</p> <p>My main objection is to the loss of Britannia Park . It is the only green space available to residents living in the Roath Basin area. There are 457 apartments in the Celestia development and 226 apartments and houses in Adventurers Quay. This amenity has been available to us since we bought our apartment in 1998. I believe planning approval was given to the Celestia developers because there was a local park available for children and residents to access. Surely it is the right of every child to have an outdoor space available for play? As it is this is not a very big park and is often crowded with people having picnics when the weather is good.</p> <p>Not only is it important to residents in the area but also to people who work in the Bay and visitors who wish to picnic and play with their children rather than use the food outlets.</p> <p>The park is also used for events, some of major importance such as the Eisteddfod.</p> <p>There are many vacant sites within the Bay, the Dr Who site for one, but this is the only park. It is time for Cardiff Council to set a protection order on the park to safeguard it for future generations and for the health of our society. At this time of severe climate change we need all the green space and trees within</p>	2 8

	<p>it that we have. The Council should be making more parks in the City not reducing them . Why not incorporate the area where the Tube used to be into the park making it bigger and more attractive and plant more trees? I also object to this Museum:-</p> <p>It has no relevance to Wales and it seems no other city wants it as it will be a financial liability</p> <p>Trees will be felled</p> <p>Where are all the proposed visitors going to park? Sunlight will be blocked by the building from what little remains of the park.</p>	
<p>John Davies Chair adventurers Quay Management Committee</p>	<p>Adventurers Quay Management Company Ltd acts on behalf of the 400 residents of 226 properties in Cardiff Bay and objects to the application, as it will destroy the amenity value of a large area of green space irreplaceably. Space which continues to be enjoyed by the public. The benefits to the public have been for thousands of people throughout the life of the Bay. The application includes record storage which could be housed anywhere without being on a site in the bay and is not of benefit to people in the Bay and logically should be housed with the bulk of records in England. The project claims improbable visitor numbers, which do not stand comparison with the reality of much superior attractions such as Techniquet and are wildly speculative, when the alternative is the known proven public enjoyment of the greenspace. It is also unclear how parking and vehicle flows could be dealt with if the project's wild speculative numbers were achieved (undoubtedly causing environmental harm and pollution). The project is damaging to the UK carbon neutral goal and does not explain how it will deal with the carbon neutral goal, as required by the recent court of appeal ruling. This objection is founded in our wish to preserve green space for our residents and the general public as there is no alternative greenspace in the Bay and its loss would also be environmentally detrimental. One can only speculate on who would benefit from the application but it is clear who would lose the citizens of Cardiff and visitors and it would be a public amenity lost for ever, unless our elected representatives reject the application in the public interest.</p>	<p>2 9</p>
<p>Katherine Jones</p>	<p>I am extremely concerned about the application for the Museum of Military Medicine on the site of the Lockkeeper's Cottage and last park in Cardiff Bay for a number of reasons:</p>	<p>3 0</p>

	<ul style="list-style-type: none"> <li>- The Museum of Military Medicine was originally earmarked and designed for a different site on the other side of Cardiff Bay. This would have been a more suitable location.</li> <li>- The listed lock keeper's cottage and park should not be relocated for development. The lock keeper's cottage should remain where it is, in its historical context.</li> <li>- Why are we destroying yet another green space in Cardiff? Cardiff Bay has already been over-developed into a concrete jungle, completely devoid of green space and ecology. This site could be an opportunity to really enhance the Bay and link to its history and green / water spaces.</li> <li>- The Museum of Military Medicine is hardly a progressive, or Cardiff specific museum. It would be better to build a museum dedicated to the history of Tiger Bay and the residents of Cardiff. If the Dr Who Experience can't survive in the Bay, I doubt the Museum of Military Medicine will.</li> <li>- As an architect, I have to say that I am not offended by the design of the building. However, I don't feel the scale or materials are suitable for the proposed location. The scale in particular is out of keeping with the Norwegian Church and the Lock Keeper's Cottage. In addition, I believe that every building should be designed in relation to the context around it, and the fact that this design was originally for another site in the Bay, and has essentially been 'lifted' into the new site doesn't feel justified.</li> </ul>	
Mia Schmidt-Hansen	<p>I object to these proposals because it involves the loss of a valuable open green space, which the current covid-19 crisis has shown is extremely valuable to a neighbourhood in terms of the mental and physical well-being of it's local inhabitants. Moreover, the loss of this green open space is in a ward and local area that has an existing deficiency in this (which I note is in breach of Local Development Plan Policy C4 on protection of open space). Even though the proposed development will leave some green space remaining, it will still negatively impact that remaining green space because the scale and dominance of the proposed building on that site will reduce the leisure amenity of the remaining green space and the visual amenity of existing vistas. This is the main reason for my objection, the reduction of green open space in an area with very little of it, and the resultant negative effect this will have on the local inhabitants in terms of their options for outside leisure time and space and the consequent negative effects this will have on their physical; and mental health, both children and adults. Of course, this will be compounded by the increase in demand this new attraction will place on local transport, traffic amount and parking facilities.</p> <p>I look forward to hearing back on this objection and hope you will prioritise the human need for green leisure spaces and not grant planning permission to these projects.</p>	3 1
Mererid Hopwood	Hoffwn fynegi fy ngwrthwynebiad i'r cynllun arfaethedig o ail-leoli Amgueddfa Feddygaeth Milwrol (a Cherddoriaeth Filwrol?) o Aldershot i ardal Bae Caerdydd. Fel un sy'n ymfalchïo'n fawr iawn o Gaerdydd	3 2

	<p>fel man geni a man ei magwraeth, mae'n siom meddwl y byddai'r ddinas yn cael ei chysylltu â'r fath ddatblygiad. Mae'r syniad o osod yr adeilad yng nghanol y Bae yn arbennig o wrthun, gan fod yr ardal yn gartref i nifer o deuluoedd Cymreig sydd â chysylltiadau agos â gwledydd a goloneiddiwyd yn ddirugaredd gan rym y lluoedd arfog Prydeinig. At hyn, mae llefydd chwarae i blant yr ardal yn boenus o brin, a byddai rhoi adeilad ar un o'r darnau glas hyn yn anheg iawn. Dylid meddwl o ddifri paham nad yw yr un o ddinasoedd Lloegr wedi dymuno cael y fath brosiect ac ystyried oni fyddai hi'n llawer gwell meddwl am ddulliau i hyrwyddo treftadaeth heddwch Cymru a dathlu'r Brifddinas yn y cyswllt hwnnw? Dyma gartref y Deml Heddwch ac lechyd wedi'r cyfan, ac mae'n eirioni trist bod cofeb i Gandhi daflad carreg o safle'r amgueddfa arfaethedig ac eglwys Norwyeg hefyd. Yn y dyddiau hyn, yng ngoleuni profiad y pandemig, meddwl am ffyrdd o gryfhau'r pethau all ein tynnu ni at ein gilydd fel dinasyddion y byd fyddai orau, nid ceisio dathlu pethau sy'n gysylltiedig â pheirianwaith sy'n ein rhwygo ni ar wahân.</p> <p>I would like to express my opposition to the proposed relocation of the Museum of Military Medicine (and Military Music?) from Aldershot to the Cardiff Bay area. As one who takes great pride in Cardiff as a place of birth and upbringing, it is disappointing to think that the city would be linked to such a development. The idea of putting the building in the centre of the Bay is particularly daunting, as the area is home to many Welsh families with close ties to countries that were mercilessly colonised by the British armed forces. In addition, play areas for children in the area are painfully rare, and building on one of these areas would be very unfair. One should seriously consider why no English city has wanted such a project and consider whether it would be far better to think of ways to promote Wales' heritage and celebrate the Capital in that respect? It is the home of the Temple of Peace and Health after all, and it is sad that a memorial to Gandhi is also a stone's throw from the site of the proposed museum and Norwegian Church. Nowadays, in light of the pandemic, thinking of ways to strengthen the things that can pull us together as citizens of the world is best, not trying to celebrate things related to machinery that tear us apart.</p>	
Dr Llion Wigley	<p>Hoffwn fynegi fy ngwrthwynebiad fel rhywun sy'n byw yng Nghaerdydd ac fel aelod o grwp heddwch Cymeithas y Cymod i'r cynlluniau canlynol 19/02506/MJR 19/02508/MNR, sy'n ymwneud ag ail-leoli Amgueddfa Feddygaeth Milwrol o Aldershot i ardal Bae Caerdydd. Rydym yn teimlo fel mudiad nad yw Bae Caerdydd, na Chymru fel cenedl, yn leoliad addas ar gyfer amgueddfa o'r math hwn sy'n bodoli i raddau helaeth i fawrygu a dathlu rhan allweddol o luoedd arfog y wladwriaeth Brydeinig, rhan a fyddai'n amhosib iddynt fynd i ryfel hebdi. Ymhellach, fe fyddai'n arbennig o ansensitif ac amhriodol i aileoli y sefydliad cwbl Brydeinig hwn, sydd heb unrhyw gyswllt na chyfranogaeth Gymreig yn ei wreiddiau na'i amcanion fe ymddengys, mewn ardal o Gaerdydd sydd â chysylltiadau mor agos a gwledydd ledled y byd a gafodd eu coloneiddio a'u gormesu gan wladwriaeth Prydain a'i hymerodraeth, rheolaeth a gynhaliwyd yn ddirugaredd ac yn waedlyd tu hwnt trwy rym milwrol, a gwledydd fel Yemen sydd ar hyn</p>	3 3

o bryd yn dioddef ymosodiadau gan wledydd y mae Prydain yn darparu arfau a chefnogaeth filwrol ar eu cyfer. Mae gan Gymru hanes a thraddodiad balch o wrthsefyll imperialaeth ag ymyrraeth filwrol y wladwriaeth Brydeinig dramor, ac ni fyddai'n deilwng o'r traddodiad hwnnw i leoli amgueddfa sy'n dathlu rhan mor allweddol o luoedd arfog Prydain yn ein prifddinas. Er bod yr Amgueddfa yn honni ar ei gwefan ei bod wedi gweithio gyda'r gymuned leol ar yr ail-leoli, mae'r manylion ar natur yr ymgynghori hwn yn brin iawn. Rydym yn galw ar Gyngor Caerdydd i gynnig ymgynghoriad cyhoeddus llawn ar y defnydd gorau o'r ardal ym Mharc Britannia lle bydd yr amguddefa arfaethedig yn cael ei ail-leoli er mwyn ystyried yn llawn teimladau a dyheadau'r gymuned leol ynglŷn â sut gellid gwneud y defnydd gorau o'r gofod gwyrdd prin hwn o fewn yr ardal yn y dyfodol. Gallai syniadau amgen gynnwys datblygu amgueddfa neu ofod dysgu o wahanol fath ar hanes cyfoethog cymuned amlddiwylliannol Trebiwt, neu ofod dysgu tebyg a fyddai'n dathlu traddodiad heddwch Cymru o Henry Richard i Gomin Greenham a thu hwnt. Serch hynny, rydym yn argyhoeddedig y dylai'r penderfyniad ar sut ddylid defnyddio a datblygu'r ardal dan sylw gael ei wneud gan drigolion y gymuned leol eu hunain yn dilyn proses agored a chynhwysfawr o ymgynghori, yn hytrach na Chyngor Caerdydd yn unig, neu unrhyw asiantaethau allanol fel yr amgueddfa arfaethedig. O fewn cyd-destun argyfwng Coronafeirws eleni a'r broses ddilynol o ailystyried ein blaenoriaethau fel cymdeithas yn gyffredinol, gall hwn fod yn gyfle da i ailfeddwl y prosiect dros y misoedd nesaf ac i Gyngor Caerdydd ailystyried eu parodrwydd i dderbyn a chefnogi ail-leoliad yr amguddefa ym Mharc Britannia. Gellid dadlau yn gryf mewn ardal o dlodi ac anghydraddoldeb sylweddol, hir-dymor lle mae gofod gwyrdd a lle diogel i blant chwarae yn brin iawn, mae nawr yw'r amser i ailfeddwl sut y gellid datblygu Parc Britannia mewn ffordd mwy gofalus a sensitif yn y dyfodol, mewn partneriaeth agos â'r gymuned leol ac mewn ffordd sy'n hybu iechyd a lles, yn feddyliol ac yn gorfforol. Mae'r amcanion hyn yn anhebygol iawn o gael eu cyrraedd trwy orfodi a chodi adeiliad enfawr, pump llawr a fydd yn trawsffurfio tirlun yr ardal ac yn taflu cysgod dros adeiladau haneysddol pwysig cyfagos fel yr Eglwys Norwyeg, a sydd heb unrhyw gysylltiad â'r ardal, ar gymuned sydd eisoes wedi cael ei hesgeuluso a'u hanwybyddu i raddau helaeth yn natblygiad ehangach ardal Bae Caerdydd dros y ddeugain mlynedd diwethaf. Mae'r amgueddfa yn haeru y bydd rhan o'r adeilad yn cael ei ddefnyddio i gynnig gwasanaethau i gyn-aeolodau o'r lluoedd arfog sy'n dioddef o 'PTSD', sydd yn amlwg yn amcan clodwiw. Serch hynny, oni fyddai'n well yn hir-dymor i wneud defnydd o'r lleoliad hwn mewn ffordd a fyddai'n gweithio'n erbyn y lefelau uchel iawn o recriwtio pobl ifanc, yn aml o dan ddeunaw oed, i'r fyddin Brydeinig o ardaloedd mwyaf tlawd a difrientiedig Cymru trwy gynnig cyfleoedd amgen i bobl ifanc o'r cymunedau hynny a fyddai'n osgoi'r posibilrwydd ohonynt yn datblygu 'PTSD' a chyflyrau tebyg yn y lle cyntaf? Mae atal salwch meddyliol o'r fath yn hytrach na'i wella yn bosib os ddefnyddiwn y cyfle hwn yng nghysgod Covid i ailosod ein amcanion fel cymdeithas yng Nghymru mewn ffordd sy'n cynnwys cwestiynu a yw gyrfa yn lluoedd arfog Prydain wirioneddol o fudd hir-dymor i bobl ifanc Cymreig. Mae'n ymddangos o'r newyddion yr wythnos hon bod Amgueddfa Gerddoriaeth Milwrol hefyd i'w gael ei chynnwys yn yr un adeilad a'r



Amgueddfa Feddygaeth Milwrol. Rhaid cwestiynu unwaith eto a yw Bae Caerdydd a Chymru yn leoliad addas ar gyfer y fath sefydliad, yn arbennig o gofio pa mor gyfoethog yw ein traddodiad cerddorol ein hunain yng Nghymru ac yng Nghaerdydd fel prifddinas, traddodiad nad yw cefnogi a hybu lluoedd arfog Prydain yn rhan ohono.

I would like to express my objection as a resident of Cardiff, and a member of the Fellowship of Reconciliation peace group, to the following plans 19/02506/MJR, 19/02508/MNR, relating to the relocation of the Museum of Military Medicine from Aldershot to the Cardiff Bay Area. As an organisation we feel that neither Cardiff Bay, nor Wales as a nation, is a suitable location for a museum of this kind that exists largely to glorify and celebrate a key part of the armed forces and British patriotism, without which it would be impossible for them to go to war. Furthermore, it would be particularly insensitive and inappropriate to relocate this wholly British institution, which seems to have no Welsh connection or involvement in its origins or aims, in an area of Cardiff with such close links with countries colonised and oppressed by the British state and empire, mercilessly and bloodily controlled by military force, and countries such as Yemen that are currently experiencing attacks by countries, of which Britain supplies weapons and military support. Wales has a proud history and tradition of resisting imperialism with the military intervention of the British state abroad, and it would not be worthy of that tradition to locate a museum that celebrates such a key part of the British armed forces in our capital city. Although the museum claims on its website that it has worked with the local community on the relocation, details on the nature of this consultation are limited. We call on Cardiff Council to offer a full public consultation on the best use of the Britannia Park area where the proposed enclosure will be relocated to fully consider the feelings and aspirations of the local community as to how this scarce green space could be used in the future. Alternative ideas could include the development of a different kind of learning space or a learning space about the rich history of the Butetown multicultural community, or a similar learning space that would celebrate the Welsh peace tradition from Henry Richard to Greenham Common and beyond. However, we are convinced that the decision on how the area in question should be used and developed should be made by the local community residents themselves following an open and comprehensive consultation process, rather than just Cardiff Council, or any outside agencies such as the proposed museum. Within the context of this year's Coronavirus crisis and the subsequent process of rethinking our priorities as a society as a whole, this may be a good opportunity to rethink the project over the coming months and for Cardiff Council to reconsider its willingness to accept and support the relocation to Britannia Park. Arguably in an area of significant, long-term poverty and inequality where green space and a safe place for children to play are very limited, now is the time to rethink how Britannia Park could be developed more carefully and sensitively in the future, in close partnership with the local community and in a way that promotes health and well-being, mentally and physically. These objectives are very

	<p>unlikely to be achieved by enforcing and erecting a huge, five-storey building that will transform the area landscape and cast its shadow over nearby important historic buildings such as the Norwegian Church, which has no connection with the area, on a community that has already been largely neglected and ignored in the wider development of the Cardiff Bay area over the last forty years. The museum claims that part of the building will be used to offer services to ex-service personnel suffering from PTSD, which is clearly a commendable objective. However, would it not be better in the long term to make use of this location in a way that works against the very high levels of recruitment of young people, often under the age of eighteen, into the army from the poorest and most disadvantaged areas of Wales by offering alternative opportunities to young people from those communities and avoid the possibility of them developing PTSD and similar conditions in the first place? Preventing, rather than curing, such a mental illness is possible if we use this opportunity in the shadow of Covid to reset our aims as a Welsh society in a way that involves questioning whether a career in the British armed forces is really of long term benefit to young Welsh people. It appears from the news this week that the Museum of Military Music is also to be housed in the same building as the Military Museum of Medicine. The question of whether Cardiff Bay and Wales is a suitable location for such an establishment is again questionable, especially given the richness of our own musical tradition in Wales and Cardiff as a capital city, a tradition in which supporting and promoting the British armed forces is not part of.</p>	
Lona Roberts	<p>I wish to convey my opposition to the proposed Museum in Britannia Park. It would not enhance the reputation of Cardiff to have such an establishment in the Bay. I am fearful for the future as we consistently normalise war in all its aspects. Please reconsider.</p>	3 4
St Johns field Ambulance Research Group	<p>I am writing to express my interest in and support for the relocation of the Museum for Military Medicine to Cardiff Bay.</p> <p>The 130<sup>th</sup> (St John) Field Ambulance Research group was formed in 2014 and is dedicated to commemorating and restoring the history of this unique Welsh unit. The 130th was the only unit in World War One recruited by St John Ambulance in Wales. It was formed, primarily, from members of St John Ambulance men in the coalfield rescue teams in South Wales. The men came from the Amman and Garw Valleys, the Rhondda Valleys, Ogmore Vale, Glamorgan and the Western Valley of Monmouthshire. It was the 130th which carried out almost all stretcher bearing at the Battle of Mametz Wood in 1916. It also gave great service at the Battle of Pilckem Ridge (Passchendaele - 3rd Battle of Ypres) in 1917. The Commanding Officer, Lieutenant Colonel John EH Davies D.S.O., an eminent Welsh surgeon, was the only Welsh Commander of a Welsh unit to retain his Command throughout the war.</p>	S 1

	<p>Largely overlooked, the 130th is an important part of Welsh Heritage in terms of Military Medicine and will have a presence at the new museum.</p> <p>The Museum of Military Medicine will not "glorify" warfare. While warfare is not desirable, the consequent leaps in medical knowledge which warfare has brought has greatly benefited our ability to treat trauma patients over the years. The history of Military Medicine is a perfectly valid subject for a Museum and Cardiff should be proud to host such a facility. It should not be dismissed lightly.</p> <p>I believe that the Museum will bring a unique insight into Military Medicine to the Welsh Capital and will be a valuable point of interest in educational terms.</p> <p>I urge the Council not to be deterred but to proceed with confidence in bringing this museum to Cardiff.</p>	
<p>Dr W A Williams</p>	<p>I am most pleased to hear about the plans for the Museum of Military Medicine (MMM) to be established in Cardiff Bay in the next couple of years. I have read much about what is planned at the new 'state of the art' Museum and I believe it will bring great benefit to those living in the area, to Wales as a whole and beyond.</p> <p>We so deserve to have that Museum up and running in our locality for a whole host of positive reasons and I back the proposal one hundred percent and feel that opposition to the project is ill-deserved and very short-sighted.</p> <p>Recalling my own experience as a mother of young children living in a flat in Cardiff Bay, I do not consider that the current planned location of the Museum and size of plot will deprive families of any significant green space in the area. There are plenty of areas in and around Cardiff Bay for children to play on and explore. Use of this specific plot of land still leaves the 'play area' available along with the green space to the side of the museum.</p> <p>Many people I speak to welcome the plans for the MMM. Particularly those with a family history of Welsh soldiers who fought in WW1 and WW2. Those soldiers were mainly working-class folk who enlisted in the Welsh Regiment to selflessly fight for their country. In addition to my grandfather and father, this</p>	<p>S 2</p>

includes many 'immigrants' in my own family who lived and worked in the Cardiff Docks/ Grangetown during the last century who became conscripted soldiers at a time of need.

Interestingly, the founder and first leader of Plaid Cymru (Lewis Edward Valentine) enlisted in the Royal Army Medical Corps in 1916 and served on the front line treating the wounded at the battle of Passchendaele. He too suffered injury with poisonous gas. Many in my family also suffered psychological and physical trauma during their service in WW1 and WW2. A respected Welsh MP at the beginning of the Boer War (1899) acknowledged that "whilst they hated the war, they loved the warriors" going off to serve. That is how the majority of Welsh people regarded the men from their communities who joined the Welsh Regiment/British Army in Wars gone by. The MMM and historical collections on how injured Welsh/British soldiers were medically managed and cared for would be of great interest to a very large number of Welsh families in view of the above.

It is the management and treatment of Medical Trauma during warfare (be it physical or psychological) which is the subject at the heart of the MMM project in Cardiff Bay. The MMM does not 'glorify' warfare, far from it. Having good come from bad situations is a noble aim. Appreciating positive medical discoveries and inventions related to the military service of our forefathers here in Wales is to be supported not decried. The huge sacrifices they made and attack on their wellbeing endured through both World Wars (and others) makes war even more tragic and wasteful if we ignore the good that we can rescue from those sad events.

By its very nature, the Museum of Military MEDICINE is a more balanced approach to Military history because it focuses on just that, the injuries and sicknesses of men who have in the past been called to Arms and experienced the horrors and consequences of that engagement. Their families in Cardiff and all over Wales had to cope with the fallout of war and this museum helps to acknowledge how something good was made of those terrible tragedies. Learn from the past, to better our current and future lived experiences. This knowledge has proved beneficial to the practice of Trauma Medicine and many other fields of Medicine in the NHS today. Wales deserve public awareness of this historical information and the MMM seems well able to provide this and communicate it to the public in a fascinating manner.

The MMM intends to promote the historical insights/inventions of Military Medicine most advantageous to civilian life where relevant knowledge can be further researched and developed. In many ways it can be used to positively support the NHS; with great potential to do so here in Wales, most notably in the area of Mental Health and resilience building. The battle against the current Coronavirus Pandemic and

related fallout will introduce huge demands on the NHS in Wales for decades to come, most notably in Psychological Medicine/Psychiatry.

I understand the MMM is planning to develop a satellite clinic (in association with the NHS) for PTSD management and plans to expand on Virtual Reality Technology to help develop strategies for the general public to help manage psychological distress (anxiety/depression).

Making the project of Military Medicine and Medical Technology a more fascinating and engaging topic for Welsh school children (from all parts of the city and beyond) it could well motivate them into becoming the future NHS Doctors and Dentists we need for the Welsh NHS to survive and flourish.

'Deep Space' technology (pioneered by the Museum of the Future in the city of Linz, Austria) with huge 3D and 2D visuals and high resolution immersive imagery as a teaching tool will help stimulate the minds of children. Perhaps 'the spark' required to ignite a life-long interest in medicine and science and hopefully future careers as physicians and scientists. In Linz the museum is also regularly used by medical students to advance their learning experience.

My niece is a manager of a dental practice locally and is acutely aware of the fall in footfall in Cardiff Bay related to the Pandemic. Local businesses linked to tourism are being adversely affected by this crisis.

Having lived locally for the past 20 years, I am in no doubt that the MMM will aid substantially in the recovery of tourism in Cardiff Bay in the coming years. My two sons (now doctorates) spent many a day in Techniquet when they were children, however I believe the MMM would have been their favourite place to visit if it were available during their childhood.

So, in conclusion I and many others in my family and many friends are in full support of the Museum of Military Medicine opening in Cardiff Bay and I would like my firm support of the project acknowledged by the Council and planning department. Kindly add this letter to others which you have published online with regard to public opinion on the Plans you are considering with regards to the establishment of the Museum of Military Medicine in Cardiff Bay. I will keep checking to see that my letter of support has been added([@https://planningonline.cardiff.gov.uk/onlineapplications/applicationDetails.do?activeTab=documents&keyVal=\\_CARDIFF\\_DCAPR\\_128842](https://planningonline.cardiff.gov.uk/onlineapplications/applicationDetails.do?activeTab=documents&keyVal=_CARDIFF_DCAPR_128842) as this issue is important to me.

<p>Len Richards Chief Executive Cardiff and Vale Health Board</p>	<p>Letter of support for the Planning Proposal – Mussum of Military Medicine, Cardiff</p> <p>I am writing to offer our continued support for the Museum of Military Museum to be based in Cardiff. The Health Board has a strong commitment to the military covenant and over the last two years, has developed a strong relationship with the Military Medicine Museum team.</p> <p>A dedicated team has been brought together tin Cardiff and Vale University Health Board, led by the Executive Director of Therapies and Scientists. Incorporated into the plans for the Museum is a hub for the wellbeing veterans, led by a dedicated clinical academic psychiatrist and clinical psychologist. Our innovation team is also involved and hope to support an innovation centre that will show case the future of military medicine in partnership with academic and industry partners.</p> <p>This strong partnership will play an important role in recognising the contribution of Military Medicine to our current health system and develop new relationships that will impact on future health and wealth of our region</p>	<p>S 3</p>