

HMS Cambria, Cardiff Bay Design and Access Statement



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1. Introduction



Statement Purpose

This Design and Access Statement has been produced to accompany an application for planning permission for a naval reserve training facility in Cardiff Bay. The development will be named HMS Cambria and will be a training centre for the South Wales Maritime Reserves and Royal Navy.

The Development

The development proposed in the application includes:

- 4,255 sq.m training facility;
- Outdoor training spaces;
- Parking area and site access;
- Landscape works; and
- Perimeter fencing.

The project is part of the Navy Command Future Reserves 20 programme. HMS Cambria is currently located at Sully on the Eastern outskirts of Barry. The need for the project is to provide permanent facilities for a modern Maritime Reserves unit in South Wales supporting the FR20 programme's objectives and have the capacity for growth in the personnel numbers.

HMS Cambria's current remote location is difficult to access with public transport and does not offer facilities to assist in the recruitment and retention of reservists. By relocating to Cardiff, which has a thriving maritime sector within its busy port, the opportunity to drive the recruitment and retention of Maritime Reserves will be enhanced.

The site will provide training and administrative facilities for the Royal Navy Reserves (RNR), Royal Marine Reserves (RMR), and the University Royal Navy Unit (URNU). It is anticipated it will enable RNR and RMR to fulfil their commitments through the following activities:

- Recruiting
- Retention
- Training
- Deploying welfare, and
- Post operation recovery.

The proposed building would provide a modern, operationally effective training facility that will be robust, adaptable and extendable, whilst maintaining a modern naval appearance which will enhance it's context.

The development is discussed in more detail in Sections 3 and 4.

Legislative Context

As a result of the Planning (Wales) Act, Design and Access Statements (DAS) are now required for the following types of development only:

- All planning applications for "major" development except those for mining operations; waste developments; relaxation of conditions (section '73' applications) and applications of a material change in use of land or buildings; and,
- All planning applications for development in a Conservation Area or World Heritage Site which consist of the provision of one or more dwellings or the creation of floorspace of 100 sq., (gross) or more.

The proposal is major development and thus requires a Design and Access Statement.

Technical Advice Note 12: Design Guidance on Design and Access Statements (March 2016) sets out the requirements that a DAS should satisfy. These are as follows:

- 1. Explain the design principles and concepts that have been applied to the development;
- 2. Demonstrate the steps taken to appraise the context of the development and how the

design of the development takes that context into account;

- 3. Explain the policy or approach adopted as to access, and how policies relating to access in the development plan have been taken into account; and
- 4. Explain how any specific issues which might affect access to the development have been addressed.

This statement has been prepared to satisfy the requirement for a DAS and provides the information identified in TAN 12.

Statement Content

This Statement is structured as follows:

- Context identifies the site location and surrounding context; describes the application site; identifies the historical context for the site and surrounding area; and, describes the planning policy context and relevant planning application history;
- Design Proposals Describes the proposed development and associated activities;
- Design Statement- Explains the design approach and analyses the design against key design criteria;
- Planning Statement Assesses the proposals against national and local planning policy; and,
- Conclusion.



Aerial view of Cardiff Bay and Cardiff Dock (development site demarcated red).

Introduction . . .

2. Context

2.1 Site Location and Description

Location

The site is located at the entrance to the Port of Cardiff. The site itself is located between Roath Dock, Roath Basin and Queen Alexandra Dock within the operational port area. The site is accessible from Tyneside Road, which connects the site to the wider local transport network. The site can be accessed by public transport routes.

The BBC / Media Zone building is located to the south west of the site (130m away) and the proposed Porth Teigr housing development would be located to the west immediately adjacent to Roath Dock (approx 40m away). Operational port land surrounds the site to the north, east and south. The Cardiff Bay commercial area is located approximately 500 metres to the west of the site and the Cardiff City Centre is located 2 kilometres to the north west.

Photographs of the site and surrounding area are included below.

Description

Existing Users

As the site is part of the operational port area it is currently secured by palisade steel fencing. Existing users include Marguess Holding / Cardiff Fuel Centre, the Cardiff Sea Cadets and Maritime Volunteer Service. There are 11 structures on the site that are associated with these users. The Atkin Group, which specialises in steel framing, is located on the site adjacent to the development site. In addition to the perimeter fencing, the site is dissected by chain-link and palisade fencing.

Habitat and Ecology

The majority of the site is hardstanding, although there are areas of scrub, semi-improved neutral grassland, bare ground and standing water.

The nearest statutory site to the development site is the Severn Estuary, which is designated as a Ramsar, Special Area of Conservation, Special Protection Area and Site of Special Scientific Interest. At its closest point the severn estuary is located 680m south east

of the development site. There are three Sites of Importance for Nature Conservation (SINC) within 1km of the site. These are the Beach Sidings SINC (680m SE of the site); Ocean Park South SINC (802m NE of the site) and Cardiff Heliport Fields SINC (951m E of the site).

Bats, including common pipistrelle, soprano pipistrelle, Nathusius pipistrelle, noctule and lesser horseshoe have been identified in the vicinity of the site, although the nearest recorded roost is 980m from the site and onsite buildings have negligible features suitable for bats to roost within. There is also limited onsite habitat for bats to forage. Even in the absence of mitigation, the development is unlikely to impact negatively on bats.

16 species of birds have been recorded within 500m, and the onsite scrub and grassland offer potential habitat for nesting birds. All wild birds, their nests, eggs and dependent young are protected by law so mitigation would be delivered to ensure no negative impact on nesting birds.

There are no records of reptiles within 2km of the site and the location and current use of the site means that it is unlikely that reptiles are present. Two species of invertebrate (grayling and small blue butterflies) are recorded as using the local area, although site survey identified no presence. An ecology survey is submitted with this application.

Flood Risk

The majority of the site is currently located in the TAN 15 Flood Zone B, however, part is located in Flood Zone C1 on the NRW flood risk maps. Furthermore over the lifetime of the development the site could become part of TAN 15 Flood Zone C1 "served by significant infrastructure, including flood defences". A flood risk assessment is therefore submitted with this application.

Ground Conditions

A ground investigation has been completed at the site. A significant thickness of made ground was encountered in all boreholes to depths of between 2.1 Above, adjacent uses to the site. Below, view down Porth Teigr Way with BBC to the left and Porth Teigr site to the right.

and 8.5m, overlying poor quality Tidal Flat deposits (soft clay/loose sand), thickness 5.4m to 6.0m. Stiff to very stiff clay (Weathered Mercia Mudstone) was encountered at depths of between 12.0m and 13.9m below existing ground level overlying mudstone bedrock encountered at depths of between 17.0m and 21.0m below existing ground level. Groundwater was observed in all the boreholes at depths of between 1.8m and 12.5m. A site investigation report is included in the application.

Transportation

The proposed development site is currently accessed via Tyneside Road via an existing priority junction which borders the western periphery of the site. The road is a local distributor road which connects the Porth Teigr Way / Cargo Road Roundabout on the south-western periphery of the proposed

development site to Pierhead Street and the A4232 approximately 250 metres to the north-west of the development site. A swing bridge is located directly adjacent to the north-western corner of the application site. The swing bridge and the road itself, although constructed to adoptable standards, is privately maintained by Associated British Ports. Parking is prohibited on the entirety of Tyneside Road by double yellow line 'no stopping or waiting at any time' Traffic Regulation orders (TRO's).

The site is connected to the surrounding area via a network of footways and shared use footway / cycleways. These are of good quality, well-lit and are flat and suitable for cycling. The closest bus stops to the site are located on Porth Teigr Way directly adjacent to the entrance to the BBC Drama Village approximately 400 metres to the south-west of the application site. A transport statement is





Site location plan (development site demarcated red).

Context . . .

Context



Photo location plan.







IMAGE 02



IMAGE 03



IMAGE 05



IMAGE 06



IMAGE 07



IMAGE 08



IMAGE 09



IMAGE 10



IMAGE 11



IMAGE 12

Existing site photographs.

Context -----









2.2 Planning Policy and Planning History

National Planning Policy

Planning Policy Wales (Edition 9, November 2016)

Planning Policy Wales (PPW) is the Welsh Government's land use planning policy for Wales. It replaces the 2015 edition of PPW. The most substantive changes are in respect of the amended Local Development Plan Regulations, Well-being of Future Generations Act and incorporation of Minerals Planning Policy.

PPW establishes that the planning system provides for a presumption in favour of sustainable development to ensure that social, economic and environmental issues are balanced and integrated in decision making. Sustainable development is defined as the process of improving the economic, social, environmental, cultural well-being of Wales without compromising the ability of future generations to meet their own needs.

Technical Advice Note 12, Design (2016)

The revised Technical Advice Notes (TAN) aims to equip all those that are involved in the design of development with advice on how sustainability, through good design, may be facilitated through the planning system plus it provides detailed guidance on the content of Design and Access Statements. It sets out the core design principles that any development proposal must follow to help create a sustainable environment and exhibit a high level of design quality.

It sets out five key objectives of good design as being: Access, Character, Community Safety, Environmental sustainability, and Movement. These are elaborated as follows:

- Access Ensuring ease of access for all;
- Character Sustaining of enhancing local character; promoting legible development; promoting a successful relationship between public and private space; promoting quality, choice and variety; and promoting innovative design;
- Community Safety Ensuring attractive, safe public spaces and security through natural surveillance;
- Environmental sustainability Achieving efficient use and protection of natural resources and enhancing biodiversity; and,
- Movement Promoting sustainable means of travel.

Technical Advice Note 15, Development and Flood Risk

On the Development Advice Map the site is mostly located within Zone A, an area considered to be at little or no risk of fluvial or coastal / tidal flooding. The site is however located adjacent to Zone C1, an area served by significant infrastructure, including flood defences. In this area development can take place subject to appropriate justification.



Zone C1: Served by significant infrastructure, in
Zone C2: Without significant flood defence infra
Zone B: Areas known to have been flooded in th
Zone A: Considered to be at little or no risk of fl

Extract from TAN 15 Development Advice Map.

- cluding flood defences
- structure
- e past
- uvial or coastal/tidal flooding

Local Planning Policy

Cardiff Local Development Plan 2006-2026

The plan was adopted on the 28th January 2016 and provides the statutory framework for the development and use of land within Cardiff over the period 2006-2026. The vision underpinning the plan is for Cardiff to be (by 2020) a "world class European capital city with an exceptional quality of life at the heart of a thriving city region" (p.16).

Within the plan the development site is located within Cardiff Port, which is designated under plan policy EC1 as existing employment land. It is also located adjacent to the proposed Porth Teigr housing development, which is is designated as a Housing Commitment under plan policy KP1. The site is also located adjacent to the Bay Business Area which is designated under plan policies KP10 and EC4.

Policies that a relevant to the development and site are identified below:

- Policy KP5: Good Quality and Sustainable Design requires all new development to be of a high quality, sustainable design and make a positive contribution to the creation of distinctive communities, places and spaces. To achieve this the policy identifies key design requirements. Those relevant to the development are responding to local character and context; providing legible development; providing a healthy and convenient environment; maximising renewable energy solutions; delivering a resource efficient and climate responsive design; that can respond to future requirements; ensuring no undue effect on the amenity of neighbouring occupiers; and, fostering inclusive design.
- Policy KP6: New Infrastructure Requires new development to make appropriate provision for all essential and necessary infrastructure required as a consequence of the development.
- Policy KP7: Planning Obligations Establishes that planning obligations will be sought to mitigate any impacts directly related to the development and will be assessed on a case by case basis.
- Policy KP8: Sustainable Transport Requires development to be integrated with transport infrastructure and services to reduce travel demand by car and achieve a target 50% modal split between journeys by car and journeys by walking, cycling and public transport.
- Policy KP9: Responding to Evidenced Economic Need Commits to provide a range and choice of new employment sites, and protect the erosion of existing employment land in the face of alternative uses (predominantly residential). The policy safeguards existing business, industrial and warehousing land and high quality and accessible office accommodation. However, the policy also notes that consideration will be given to change of use of lower quality office and industrial premises that do not perform an important strategic or local role in terms of the overall range and choice of premises. The policy notes that where alternative use of land is considered appropriate, priority will be given to mixed-use development comprising, employment housing and community facilities. Within the policy the importance of the Cardiff Port and ABP and its tenants, who directly and indirectly support over £1.7 billion of gross output in Wales, is recognised.
- Policy KP12: Waste Sets outs the measures to ensure sustainable waste management is achieved. This includes the provision of sustainable waste management storage and collection arrangements in all appropriate new developments.



Extract from the Cardiff Local Development Plan Deposit Plan.

- Policy KP15: Climate Change Sets out the measures to mitigate the against the effects of climate change and adapt to its impacts. This includes promoting energy efficiency, avoiding areas susceptible to flood risk in accordance with the sequential approach and preventing development that increases flood risk.
- Policy EC1: Existing Employment Land Protects the city's employment land that is located outside of . the Central and Bay Business Areas for B use class employment generating uses.
- Policy EC3: Alternative Use of Employment Land and Premises Identifies the reasons when the development of business, industrial, and warehousing land is acceptable. This includes when the land or premises are no longer well located for business, industrial and warehousing use; when there is no realistic prospect of employment use on the site and/or the property is physically unsuitable for employment use, even after adaption/refurbishment or redevelopment; there is no need to retain the land or premises for business, industrial or warehousing use, having regard to the demand for such land and premises and the requirement to provide for a range and choice of sites available for such use; and there will be no unacceptable impact on the operating conditions of existing businesses.

Context

Context

- Policy EN3: Landscape Protection Prevents development from causing unacceptable harm to the character and quality of the landscape and setting of the city.
- Policy EN7: Priority Habitats and Species Protects priority habitats and species and requirement for . mitigation when harm is unavoidable.
- Policy EN9: Conservation of the Historic Environment Only permits development relating to heritage assets when it can be demonstrated that the development preserves or enhances the asset's architectural quality. Assets include Listed Buildings and Scheduled Ancient Monuments.
- Policy EN10: Water Sensitive Design Requires development to apply water sensitive urban design solutions to manage water demand and supply, waste water and pollution, rainfall and run off and flooding.
- Policy EN11: Protection of Water Resources Prevents development that would cause unacceptable harm to the quality or quantity of underground, surface or coastal waters.
- Policy EN12: Renewable Energy and Low Carbon Technologies Requires development to maximise the potential for renewable energy.
- Policy EN13: Noise, Air and Pollution Prevents development that would result in unacceptable harm to health, local amenity because of air, noise, light pollution or the presence of unacceptable levels of land contamination.
- Policy EN14: Flood Risk Prevents development within tidal or fluvial flood plains unless it can be demonstrated that the site is justified in line with national guidance and an appropriate technical assessment has been undertaken to ensure the development is designed to alleviate the threat of flood risk. The policy also prevents development that would increase risk of fluvial or tidal flooding.
- Policy T6: Impact on Transport Networks and Services Prevents development that would cause unacceptable harm to the safe and efficient operation of the highway, public transport and other movement networks, including pedestrian and cycle routes, public rights of way and bridle routes.
- Policy C3: Community Safety / Creating Safe Environments Requires new development to promote a safe and secure environment, through maximising natural surveillance, having well-defined routes, provide good standards of lighting and distinguish between public and private spaces.

Planning History

Full planning permisison was granted for the scheme in June 2017 (17/00383). The development permitted was the same as that now sought, although the building was larger in scale (4,659,sg.m) and subject to alternative elevation treatments. The permission was subject to a series of pre start conditions, the majority of which have now been discharged.

The most significant planning permission in close proximity to the development site is for the Porth Teigr redevelopment scheme (14.8 ha in total). The scheme has a significant planning history associated with permission 03/00099/C, which permitted the redevelopment of former operational port land to create a mixed use development of housing (1010 units), office and business space (112,000 sq.m), retail and leisure commercial uses (11,000 sq.m) and open spaces and car parking (3,141 spaces). Associated applications submitted since this permission related to approval of conditions, enabling engineering works and reserved matters.





Above: CGI of the permitted HMS Cambria scheme. Below: Impression of the permitted Porth Teigr residential development (included in reserved matters application 15/00787/MJR)

2.3 Historic Context

The application site was part of the historic Cardiff Docks, which grew rapidly throughout the 19th century as the coal and iron trades flourished. Significant developments during this period included the opening of the Bute West Dock and its seaward entrance known as the Oval Basin in 1839, the opening of the Bute East Dock in 1855, the opening of the Roath Basin in 1874, and the opening of the Roath Dock and Queen Alexandra Dock in 1887 and 1907 respectively.

Photographic evidence exists of the site being used to accommodate Lewis Hunter Coaling Cranes. The latter were the creation of Sir W.T. Lewis and Mr Charles L. Hunter and were used in the docks from the late 19th century onwards. The cranes revolutionised the transportation of coal from the docks as it provided the ability to manage large cargoes while minimising the breakage of coal.

The images opposite show the HMS Cambria proposed site, with four of the Lewis Hunter coaling cranes positioned directly alongside the site boundary, which would load and unload into Roath Docks.



View of C.H. Bailey Ltd., dry dock owners & ship repairers and surrounding dockyard, Cardiff



Historic image of the site with Lewis Hunter Coaling Cranes in operation.

Context



Lewis Hunter Coaling Cranes

3.The Development

3.1 Development Use

Land Use

The development will be used as a training centre for the military, primarily by HMS Cambria, which is the Royal Naval Reserve Unit associated with Cardiff. The facility would also be used on occasion by the Royal Marines reserves. The reserves (adult volunteers) would attend the facility for periods of physical training and education to prepare them for periods of active service at sea.

The internal uses of the building include class rooms, sleeping accommodation, hall / assembly space, offices, store rooms, bar, kitchen / canteen. The site is to be physically secure. The use does not fall within planning use class D1 Non-residential institutions (training centre) as it includes accommodation. The use does not fully fit within planning use class C2A Secure residential institutions as the accommodation is not the primary use of the building, and despite being used by the military, it will not be a military barracks (within class C2A). The proposed development is considered then to fall within use class 'Sui Generis'. This category comprise uses which do not fit comfortably within the defined use classes order categories.

HMS Cambria

HMS Cambria was established as a Royal Naval Reserve unit in July 1947, and originally occupied buildings in Cardiff Docks where it remained until 1980, when the redevelopment of the docks precipitated a move to accommodation in Sully, Vale of Glamorgan.

Over the years HMS Cambria, like many other Royal Navy Reserve units operated a number of seagoing ships. The unit's first ship was a motor minesweeper, which was replaced in 1954 by a wood-hulled minesweeper named the Brereton. This in turn gave way to the Crichton which operated between 1961 and 1976. In 1976 all of these ships were rechristened HMS St David. In 1978 the unit aquired a converted trawler, which was again renamed HMS St David. The unit's final ship was acquired in 1984 and was named the Waveney, which was not renamed. The Waveney remained with HMS Cambria until 1994 when the reorganisation of the Royal Naval Reserve led to the abandonment of seagoing tenders.



The HMS Cambria crest.

Shore Accommodation in the Royal Navy

The nickname for a naval establishment on land is a stone frigate. The name originated from the use of Diamond Rock by the Royal Navy during the Napoleonic Wars. Diamond Rock is located off Martinique, and it was used as a 'sloop' of war between 1804 and 1805 to harass the French. The command of the first stone frigate was given to first lieutenant, James Wilkes Maurice, who with cannon taken from the ship of Commodore Sir Samuel Hood manned it with a crew of 120 until it was captured by the French in the Battle of Diamond Rock in 1805.

Until the late 19th century, the Royal Navy did not use shore accommodation widely as it was regarded to be expensive and liable to lead to indiscipline. Training and other support facilities were therefore located in hulks (old wooden ships) moored in ports. These floating establishments kept their names while the actual vessels housing them changed.



Above, Diamond Rock. Below, painting of the Battle of Diamond Rock.



3.2 The Development

Proposed Development

The proposed development consists of the following: upgraded site access; demolition and removal of existing site structures; reprofiled and resurfaced site; internal road layout (including layby and delivery / collection area) and parking area; gatehouse area; waste and recycling area; external exercise area; hardstanding area for drills and overflow car parking (if required); soft landscape; external lighting; 4,255 sq.m building; and security fencing.

The building will include a lobby; induction area; male and female changing areas; dormitories; fitness suite; kitchen and canteen area; bar; office space (open plan and enclosed) with break out areas; and, teaching spaces. Part of the roof space would be used to accommodate photovoltaics. An area for the future expansion of the building is provided.

A site layout is provided in Section 4.

Operational Hours

The training centre would be manned 24 hours a day seven days a week. However, the centre would typically actively operate five days per week 08:00-16:30; three evenings per week 18:30-22:30; and one weekend per month 19:30 Friday - 15:30 Sunday. The facility would, however, be required to operate 24 hours a day if necessary. Security personnel would be present on site at all times, and access into the site would be via a security area.

Volunteer and Staff Numbers and Travel Patterns

During the week and weekend there would typically be 70 volunteers on site at any one time and approximately 10 members of staff. During the week the majority of volunteers would not stay on the premises and overnight occupation would be minimal. During the weekend trainees or staff would stay at the facility. Dormitory space would be provided for 50 individuals.

The majority of the reserves and staff would arrive at the site by car, however, arrival at the site by sustainable modes of travel would be encouraged. As such a space for every attendee is not proposed. Rather it is proposed to deliver 53 parking bays; 6 disabled parking bays; 2 mini-bus bays; 3 motorbike spaces; and, cycle spaces. Service vehicles to the site would vary, but generally range from 4-20 deliveries per week.

Onsite Training Activities

The training activities that would be undertaken at the site would not be considered anti-social. Outdoor training would consist of fitness drills, obstacle negation and rope training. Other similar training facilities located throughout the country are located in residential areas and operate without negative effects on neighbours. HMS Cambria would be mindful of the closest neighbours and site activity, in particular outside activity, would be managed accordingly. Given that the facility would be located within the Cardiff Port boundary no amenity issues are expected to arise. The fitness suite would be available to staff and volunteers 24 hours a day.

Community Uses

Outside the main hours of operation the site would be made available to local community groups, although no formal arrangements are in place.

The Development

4. Design Statement

4.1 The Brief

HMS Cambria is currently located at Sully on the Eastern outskirts of Barry. The need for the project is to provide permanent facilities for a modern Maritime Reserves unit in South Wales supporting the Royal Navy's objectives to have the capacity for growth in personnel numbers.

The project aims to improve the operational efficiency by unifying the currently disparate facilities of the Royal Navy Reserves (RNR), Royal Marine Reserves (RMR), and University Royal Navy Unit (URN) and provide them with facilities to recruit & train future reservists

HMS Cambria's current remote location is difficult to access with public transport and does not offer facilities to assist in the recruitment and retention of reservists. By relocating to Cardiff, which has a thriving maritime sector within its busy port, the opportunity to drive the recruitment and retention of Maritime Reserves will be enhanced.

A key requirement of the brief was the need for a strong image to the building that reflects the 'brand' of the Royal Navy. The Royal Navy is a powerful entity with a proud heritage that demands a strong identity to project into the future. The Royal Navy is a unique combination of land, air and sea capabilities merged into a single flexible and dynamic force. The design of the building has been required to capture this essence.

4.2 Site Environment

The design of the development layout has been informed by the site's environment. This process is summarised below and includes analysis of :

- Sunlight;
- Wind speed and direction;
- Views; and,
- Future development







Feb Jan Mar Apr May Jun Jul Aug Month of year 01 02 03 04 05 06 07 08 Dominant Wind dir. Wind probability 42 42 43 44 39 38 40 37 >= 4 Beaufort (%) Average Wind speed 11 10 11 11 10 10 10 10 (kts) Average air temp. (°C) 11 14 17 18 18

Site analysis.

Design Statement



Wind direction distribution in (%) Year

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4.3 The Proposals

Site Layout

An uncluttered clear and rational site layout is proposed incorporating a range of activities for the use of the building. Vehicular access would be provided via an upgraded site access from Cargo Road into a secure compound. Once within the site, delivery and service vehicles would be directed around the entrance island to keep these vehicles under supervision and away from building users. A delivery and collection bay would be located outside the stores. Cars and minibus movements would be directed forward to go around the one way route with 53 standard parking bays, two mini bus bays and 6 disabled bays conveniently located opposite the main entrance.

A safe and designated pedestrian and cycle route would be delivered with access controlled by the gatehouse. Cycle storage would be located close to the main entrance with a clear path taking visitors across the carpark and towards the main entrance.

The exercise and rope climbing apparatus would be located to the southern end of the site and be set within an extensive landscaped area. The surface finishes across the site would be varied to offer interest, aid wayfinding and assist with the maintenance of the facility. An area of grass is proposed adjacent to the south elevation to facilitate future expansion of the building should it be required.

The total GEA of the building is 4,255 sqm and is based on the following individual floor areas ground floor: 1,105 sq.m; first floor: 1,050 sq.m; second floor: 1,050 sq.m; and third floor: 1,050 sq.m.



Proposed site layout. (Drawing not to scale).

Ground Floor Plan

The ground floor arrangement would be defined by a spacious lobby that will provide permeability through the building. Off the lobby area there would be a series of functional uses that include: a fitness suite; changing areas; store rooms; briefing room; and, utility and plant areas. A control point would be located in the lobby to provide optimum visibility to ensure security.



Proposed ground floor layout. (Drawing not to scale).

Design Statement

Design Statement

First Floor Plan

The first floor will provide the majority of the accommodation (bunk rooms); shower and wash facilities; a wardroom; kitchen and dining hall; food stores; and, residential lounge with bar. A void around the central stair core will provide viewpoints down into the foyer on the ground floor. The dining area would have a void above it so that it can be viewed from the second floor.

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Proposed first floor layout. (Drawing not to scale).

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Second Floor Plan

The second floor would accommodate open plan office areas that could be used flexibly for administration or education. Views from the central corridor down into the foyer area and the dining area would be provided through voids above each space



Proposed second floor layout. (Drawing not to scale).

Design Statement

Design Statement

Third Floor Plan

The third floor would accommodate the teaching spaces. A variety of classroom sizes is proposed to offer flexibility of use for a variety of teaching scenarios. Future expansion space would be provided to the south of the floor.

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Proposed third floor layout. (Drawing not to scale).

Roof Plan

The roofplan would have a simple arrangement with a centrally positioned service zone to minimise the visual impact of externally located M&E equipment. A perforated metal plant screen would be provided to screen views of the plant. Roof mounted Photovoltaic Panels are proposed in the south section of the roof space. The roof level would be accessed from the third floor via an access hatch located in the northern section of the space.



Proposed roof plan layout. (Drawing not to scale).

Design Statement

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Building Sections

Building sections A, B and C. (Drawings not to scale).



(03110)

Elevations

The development proposes a high quality, exciting contemporary building to reflect the dynamism of the end users. A key objective is to respect the brand of the Royal Navy as a military force that operates on land, in the air and at sea. The buildings purpose is the attraction and retention of personnel numbers and the architecture was designed to help meet this aim.

The grounded brick plinth and the strong graduated blue horizontal bands with colours found in the sea and air reflects the Royal Navy's fields of operation. Feature lighting will also be applied around the recessed glazing bands on each floor to all elevations adding further interest during the night. The horizontal banding also reflects the new horizons and adventures recruits will experience with their career in the Navy. The purity of form as a simple cuboid reflects the strength and efficiency of the organisation it serves.

The main entrance is celebrated with a strong vertical blue band with the signage and canopy further emphasising the building entry. The banding principles are applied continuously to all elevations with the stair cores glazed along the gables adding a layer of activity. All glazing to the main accommodation would be set with a minimal recess from the outer cladding line to further emphasise the horizontality.

The Royal Navy has an enviable heritage of world class standards of training and the proposed HMS Cambria will facilitate in maintaining these standards serving the community of South Wales.





From left: North and south building elevations. (Drawing not to scale).

Design Statement

Materials Key:

Insulated Metal Panel Supplied by: Kingspan Evolution NBS Ref: H92





Curtain Wall Glazing Supplied by: Sapa NBS Ref: H11



Blue Engineering Brick Plinth Supplied by: Taylor Maxwell NBS Ref: F10



Windows with Blue Tint Glass Supplied by: Sapa NBS Ref: L10



Perforated Metal Plant Screen Supplied by: Italfim NBS Ref: L10/650

Notes:

Royal Navy sign to be illuminated along with individual 'HMS CAMBRIA' lettering.

Design Statement





Top to bottom West and east building elevations. (Drawing not to scale).

Materials Key:

Insulated Metal Panel Supplied by: Kingspan Evolution NBS Ref: H92





Curtain Wall Glazing Supplied by: Sapa NBS Ref: H11



Blue Engineering Brick Plinth Supplied by: Taylor Maxwell NBS Ref: F10



Windows with Blue Tint Glass Supplied by: Sapa NBS Ref: L10



Perforated Metal Plant Screen Supplied by: Italfim NBS Ref: L10/650

Notes:

Royal Navy sign to be illuminated along with individual 'HMS CAMBRIA' lettering.





Precedent Images of Composite Metal Cladding

Blue Engineering Brick Base



Proposed elevational treatments. (Drawing not to scale).

Design Statement

Design Statement

External Finishes

The external finishes for the site are described below and illustrated opposite. A mix of hard and soft landscape treatments are proposed to ensure that the site is both functional and attractive. The proposed treatments would significantly improve the external appearance of the site and increase the amount of attractive landscape located on it. A softworks plan that provides further detail on landscape treatments is included with the application.

Hard landscape finishes would include:

- Feature paving At the building entrance . •
- Tarmac For the internal highway, parking areas and pedestrian areas.
- Gravel For the rope apparatus areas.
- Fence 3000mm High CPNI Base Protection Level Welded Mesh (ISF) Fence. •

Soft landscape would include:

- Grass Adjacent to the southern elevation of the building and to frame landscape areas.
- Ground cover shrubs On the site's southern boundary. .
- Tree planting appropriate to the coastal setting Located in key areas on the site to frame the site. •

The tree planting proposed has been recommended by Cardiff Council's Landscape Officer and includes:

- Alnus incana 'lacniata' Alder •
- Arbutus unedo Strawberry Tree
- Gingko biloba Maidenhair Tree
- Hippophae salicifolia 'streetwise' Sea buckthorn •
- Ilex Castaneifolia Chestnut-leaved Holly
- Pinus pinea Stone Pine;
- Sorbus Intermedia Swedish Whitebeam .
- Quercus ilex Hedging Evergreen Oak; and
- Crocus bulbs (red and white).

Refer to softworks plan included in the submission for details on tree planting.





External finishes layout. (Drawing not to scale).

Design Statement

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Hard Landscaping:

Tarmac

Feature Paving Colour: blue (to match brick plinth)

Gravel

Soft Landscaping:

Ground Cover Shrubs (appropriate to context)

Grass

ercusilex Hedging

Ilex Castaneifolia x4

Crataegus x Prunifolia Splendens x2

Pinus Pinea or Pinus Pinaster x1

Arbutus Unedo Standard x4

Sorbus Intermedia x1

NOTE: All excavations for hard and soft landscaping, including trees, furniture, signage and fencing to be supervised by an EOD engineer. Refer to EOD contracts desktop study report "170626 DTS Report 17311" for full mitigation measures.

Soft landscape details to landscape architects design and specification.

4.4 Design Review

The design of the development has followed the principles of good design as highlighted in Technical Advice Note 12: Design. The key areas of design include:

- Access Ensuring ease of access for all;
- Character Sustaining of enhancing local character; promoting legible development; promoting a successful
 relationship between public and private space; promoting quality, choice and variety; and promoting
 innovative design;
- Community Safety Ensuring attractive, safe public spaces and security through natural surveillance;
- Environmental Sustainability Achieving efficient use and protection of natural resources and enhancing biodiversity; and,
- Movement Promoting sustainable means of travel.

Access

The main building would be easily accessible to all users. Disabled parking bays would be located opposite the main entrance to ensure convenience and ease of use. Once inside the building, full access to all floors would be available with the use of a lift.

The site layout would provide a logical and safe approach to all building users whether they arrive as pedestrians or via other modes of transport. The revised site entrance would include an enhanced waiting area for vehicles that would prevent queuing on the carriageway as vehicles enter the secure area for checking. The layout has also been designed to accommodate a range of large and small vehicles on the site (including HGV's) and ensure that all vehicles leave the site in a forward gear.

Pedestrian movement through the site would also be controlled via the gatehouse which would then lead to a clear and safe route through the carpark to the main building entrance. The cycle parking would be located conveniently and safely adjacent to the gatehouse.

Equality of access is ensured into and within the site and building regardless of physical or sensory impairment.

Character

The high quality design of the development would significantly improve the appearance and character of the development site. The scale, layout, landscape, use, form and materials proposed would work collectively to create a modern development that respects the character of the surrounding port and other land uses, including the proposed Porth Teigr residential scheme.

The building proposed reflects the dynamism of the end users. The Royal Navy operates on land, in the air and at sea, and the building design with the grounded brick plinth and strong graduated blue horizontal bands reflect these fields of operation. The strength and efficiency of the Royal Navy is reflected in the building's purity of form as a simple cuboid.

Night time interest will be provided by feature lighting, which will be applied around the recessed glazing bands on each floor.

Community Safety

The site environment would be secured by the existing steel palisade perimeter fencing, and all building users would be required to access the site via the secured area and the gatehouse, which has been positioned to offer the greatest natural surveillance. The parking areas and wider external site area would be appropriately lit and be provided with CCTV that will be monitored 24 hours a day for safety and security purposes. High levels of natural surveillance would be provided out of the building by the proposed internal layout and the glazing proposed to the elevations. The proposed use of the site would also ensure that there would be a greater presence on the site than that currently provided, which would improve natural surveillance of the local area.

Although due to security and the nature of the facility there would be no public access to the facility, the scheme would create a more attractive public realm than the current situation with landscape being provided along the road frontage.

Environmental Sustainability

The scheme would incorporate solar panels on the roof that would provide power to the building and would utilise sustainable initiatives exceeding the minimum requirements laid out by Building Regulations. In addition, the development would seek to achieve a BREEAM Excellent rating. The site's biodiversity would also be significantly enhanced by the landscape proposals that would include native tree and shrub planting across the site. This would be of value to site ecology

Movement

While the bespoke nature of the development means that the majority of users would access the facility by vehicle, the site is accessible from the local public highway network. Car parking numbers have therefore been limited appropriately so that spaces would be provided for 66% of the anticipated building users only, and mini-bus spaces have been incorporated to reduce reliance on private vehicle. The facility would also operate in accordance with a Green Travel Plan, which would promote sustainable travel to the site.





CGI visual of HMS Cambria.

Design Statement

4.5 Supporting Reports

The scheme design has been informed by a series of technical studies and advice. A summary is provided below.

Lighting

A lighting strategy has been prepared for the site to ensure that external lighting would be designed to minimise light pollution. The environmental zone for the development would be environmental zone E3 (sub urban surrounding with medium district brightness). To comply with BS EN 12464-2 for the car park access road and adjacent walkways the illuminance and recommended Uniformity Uo would be 10 Lux and 0.4 / 0.25 respectively. The lighting to the façade of the new building would provide 5 Lux with no prescribed uniformity due to the decorative nature of the luminaires. The dock edge access lighting would adopt 5 Lux @ 0.25 Uniformity. External lighting controls would be used to control the luminaires. The lighting of the car park would operate on a dusk - dawn lighting sensor [BREEAM Ene3] with time clock to facilitate 50% dimming or switch off during out of hours (curfew) operation i.e. 23:00-0700 hrs. The lighting to the perimeter of the building would be controlled with a dusk - dawn lighting sensor [BREEAM Ene3] with time clock switch override to turn the lighting off when required. The lighting of the path and access walkways shall operate on a dusk till dawn lighting sensor [BREEAM Ene3] with time clock to facilitate 50% operation i.e. 23:00-0700 hrs. The lighting out of hours (curfew) operation i.e. 23:00-0700 hrs. The lighting out of hours (curfew) operation i.e. 23:00-0700 hrs. The lighting out of hours (curfew) operation i.e. 23:00-0700 hrs. The lighting out of hours (curfew) operation i.e. 23:00-0700 hrs. The lighting out of hours (curfew) operation i.e. 23:00-0700 hrs. The lighting to the perimeter of the building sensor [BREEAM Ene3] with time clock to facilitate 50% dimming or switch off during out of hours (curfew) operation i.e. 23:00-0700 hrs. The flood lighting shall be designed and aligned to ensure that the upper limit of the main beam does not exceed 70 degrees from its downward vertical.



Site lighting plan. (Drawing not to scale).

Noise

An Acoustic Report has been prepared, which demonstrates that road traffic noise is the dominant source of noise in the area and dictates the general noise climate. During the day, all elevations are typically subject to noise levels of 60 dB LAeq,T. During night-time periods, noise levels are typically in the order of 56 dB LAeq,T. These noise levels are exceeded at times, but considered suitable for the purposes of design. Where natural ventilation is proposed, façade performances would be limited to a maximum of 15 dB. The internal noise level criteria BS8233 'Guidance on sound insulation and noise reduction for buildings' would still be achieved, where rooms are naturally ventilated, but would generally result in noise levels at the upper end of the criteria. Teaching spaces on the third floor are an exception to this, so acoustic ventilators on the roof would be considered to reduce noise levels. From the measurements conducted on site, LAmax noise levels at the bunk facades are not generally expected to exceed 80 dB. Therefore, Internal LAmax noise levels of 65 dB are not expected to be exceeded, based on the current proposed use of mechanical ventilation for sleeping accommodation. Windows serving bunks would need to achieve Rw 35 dB.

Ecology

The development layout has been informed by the recommendation of the Preliminary Ecological Appraisal. Enhancement would include the provision of bat boxes; no lighting of the adjacent water to avoid disturbance of water born wildlife; and, the inclusion of site landscape that would provide native species of high value to pollinators, foodplants for grayling and small butterfly and areas of scrub for nesting birds.

Transport

The development layout has been informed by the recommendations of a Transport Statement. Based on the predicted numbers of facility users (70 Adult Volunteers and 10 staff) and proposed hours of use, the Transport Statement identifies that vehicle trips associated with the development would not have a material impact on the safe and efficient operation of the surrounding local highway network. The Transport Statement recommends 53 parking spaces, 6 disabled bays and 2 mini bus spaces to cater for the vehicles associated with the development, and also analyses the proposed access into the site to demonstrate that it would safely accommodate the flow of vehicles associated with the development.

Ground Investigation

A Ground Investigation Report has been prepared to establish the conditions of the site and appopriate remediation. The report identifies a significant thickness of variable Made Ground on the site, which overlays poor quality Tidal Flat deposits. Piled foundations would therefore be the preferred option for the main building with raft foundations used for small lightly loaded ancillary structures. Significant levels of soil contamination have been encountered which exceed guideline values for residential end use without home grown produce, public open spaces and commercial end use. Remediation would therefore be undertaken, particularly on soft landscape areas, where 600mm thickness of clean inert material would be placed on top of suitable membrane. Contaminated Made Ground would be left in situ where beneath hard cover development as this would essentially seal contamination. Elevated levels of hydrocarbon contamination are present in ground water, but it is remote from the dock and based on the results to date not considered to pose a risk to the dock. Monitoring would nevertheless be undertaken during the construction and operation phases. The risk of contamination being mobilised during piling would be low provided suitable methods are employed during the piling. A Piling Risk Assessment accomponies the Ground Investigation Report. A detailed Remediation Strategy has also been prepared.

Flood Risk and Site Drainage

The development has been informed by the recommendations of a Flood Consequences Assessment. The site is currently within Flood Zone B on the TAN 15 Development Advice Map, and is protected by tidal defences. However, on the NRW flood risk map, the site is partly within flood Zone C1 and over the lifetime of the development the site would potentially become part of flood Zone C1 (as identified on the TAN 15 Development Advice Map) if the existing tidal defence scheme is not maintained and protection increased in line with climate change induced sea level rise. The Assessment therefore recommends finished floor levels of 9.6 AoD to ensure that the development is safeguarded from flooding. A sustainable drainage strategy is also incorporated into the Assessment.

The surface water strategy would replicate the existing arrangement, and would be discharged at an unrestricted rate into the Cardiff Docks tidal waters. Existing outfalls would be used where possible. An alarmed class 1 oil separator would be provided upstream of the outfall to ensure that water quality is not adversely affected. The foul water drainage strategy is to drain the proposed HMS Cambria development is to provide a new packaged sewage treatment plant on the site, to discharge treated effluent to Cardiff Docks to the necessary water quality standards. The proposed unit is to be fully compliant with BS EN 12255 and other relevant legislation and standards. A new consent from NRW to cover this new treatment plant will be sought. A drainage plan is provided opposite that illustrates both of these arrangements.

Services & Utilities

The existing site has a number of industrial type buildings located within the boundary and a significant amount of underground, street lighting & overhead utility and port services which would be appropriately cleared / diverted prior to construction. An existing Western Power Distribution 11kV cable would require diversion. The new supply would emanate from the Cargo Road substation and run in the pavement up to the main security gates where the WPD and other utility services would run across the car park and terminate within or adjacent to the new building. A Wales and West Utilities low pressure gas main would be relocated to avoid the perimeter fencing around the site, with the supply rising from below ground before entering the new building through the wall of a ground floor plant room. The supply will pass through a Wales & West Utilities gas meter to serve the building. A Welsh Water main would need to be diverted and laid internal and external to the construction boundary. The mains cold water supply would be brought into the site from a connection to a new Welsh Water main in Cargo Road. A new fire hydrant that would be within 18m of the entrance doors to the new building would be provided as part of the diversion works. BT Cables would require significant diversion and would be undertaken prior to the commencement of construction.



Site drainage strategy. (Drawing not to scale).

Design Statement

5. Planning Statement

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990 state that where a determination is to be made under the planning Acts the determination must be made in accordance with the development plan unless material considerations indicate otherwise. This replaced the earlier wording under Section 54A of the Town and Country Planning Act 1990 (as amended). The adopted plan for the development site is the Cardiff Local Development Plan, 2006-2026.

The table below demonstrates how the proposed development conforms to the relevant policies of the Cardiff Local Development Plan and also the key national planning policy that informs the policies in the Plan.

National Planning Policy	Policy KP9: Responding to Evidenced Economic	The de	
Planning Policy Wales	Section 4 of the DAS sets out the design approach to the development. It is considered that the section demonstrates that the development is sustainable and in accord with Planning Policy Wales' presumption in favour of sustainable development.	Need	develo site on (emplo further
Technical Advice Note 12	Section 4 of the DAS demonstrates that the design of the development would be sustainable, appropriate in character to the site and surrounding area and foster a safe environment for users. It also demonstrates that the development will be accessible to all users and connected to the local public transport network.	Policy KP12: Waste	The sit of was which served use. Th undert Manac
Technical Advice Note 15	A Flood Risk Assessment is included in the planning application. An appropriate drainage strategy has been formulated for the site and finished floor levels have been set to satisfy guidance.		of exist earthw develo with a
Local Planning Policy	Policy KP15: Climate Change	Althou	
LDP Policy KP5: Good Quality and Sustainable Design	Refer to Section 4, which demonstrates that the proposed development would be high quality, legible, appropiate to the local context and sustainable. Section 4 also demonstrates that the development would be inclusive and accessible for all users.	re tc er pi g	
Policy KP6: New Infrastructure	The infrastructure requirements of the development are detailed in the Transport Statement and Services Strategy. The necessary connections and upgrades	Policy EC1: Existing Employment Land	increas As per analysi
Policy KP7: Planning Obligations	would be undertaken in accord with statutory bodies.No planning obligations are considered necessary.	Policy EC3: Alternative Use of Employment Land and Premises	As per analysi
	Access to the site would be via a new access on land that is owned by the applicant and which is not currently adopted highway. The suitability of the access is demonstrated in the Transport Statement, which also identifies no requirements for further upgrades to the wider local highway network. A detailed design is also provided.	Policy EN3: Landscape Protection	Given t the dev on the

Policy KP8: Sustainable Transport

The site is accessible by walking, cycling, and public transport with a high frequency bus service operating within 400 metres of the proposed development site. An appropriate number of parking spaces is proposed to reflect this, and also the bespoke requirement of the development. 10 cycle spaces are proposed on site and showers would be available in the building. It is therefore considered that the development complies with Active Travel Act requirements and the policy. evelopment is considered to comply as gh the use would be Sui Generis the pment would create employment and the ly consists of 0.77% of the total active port oyment) land in Cardiff Port. Refer below for r analysis. e includes a bespoke area for the storage te and recycling adjacent to the site access is accessible from the internal site road and by a waiting area that refuse collectors can he construction of the development would be aken in accord with a Construction Site Waste jement Plan and include for the recycling ting hard surfaces. Beyond this minimal orks are expected. The operation of the pment would be undertaken in accordance Site Waste Management Plan. igh BREEAM is no longer a planning ement, the building would be designed EAM Excellent. It would therefore be efficient. The building would also include valtaics that would provide it with a supply of energy. Furthermore the development would in an area at risk of flooding and would not se the likelihood of flooding elsewhere. policy KP9, but also refer below for further policy KP9, but also refer below for further

> the industrial nature of the development site, velopment would have no detrimental impact City's landscape.

Policy EN7: Priority Habitats and Species Policy EN9: Conservation of the Historic	A Preliminary Risk Assessment has been undertaken which identifies that there would not be an impact on priority habitats and species if a series of precautionary enabling works / measures are undertaken prior to the commencement of development and sensitive lighting is developed. There are no Scheduled Ancient Monuments, Listed
Environment	Buildings / Structures or other features of historical features on or adjacent to the development site. The development would therefore not impact on the historic environment.
Policy EN12: Renewable Energy and Low Carbon Technologies	Renewable and low carbon technologies have been incorporated into the roof space.
Policy EN13: Noise, Air and Pollution	A noise survey has been undertaken to mitigate against noise from the surrounding port area. The development would not include activities that would result in high levels of noise that would have an adverse impact on surrounding uses. The same would apply to air quality while the construction of the development would be undertaken in accordance with a CEMP that would include measures to minimise the spread of dust. Finally, the development would operate in accordance with a Travel Plan that would promote sustainable travel to the site.
Policy EN14: Flood Risk	Over the lifetime of the development the site could become part of TAN 15 Flood Zone C1. A proposed building floor level of 9.6m AOD has been set to mitigate this risk.
Policy T6: Impact on Transport Networks and Services	The Transport Statement identifies that the development would not be likely to have a material impact on the operation of the surrounding highway network due to its primary hours of operation and the level of car parking (53 standard bays, 6 disabled bays and 2 mini-bus bays) and cycle parking (10 spaces).
Policy C3: Community Safety / Creating Safe Environments	The facility would be provided with a secure environment through perimeter fencing, which will enclose the building. The building faces outwards to ensure a degree of natural surveillance, and the proposed use would increase the number of hours when the site is active. Finally, the layout incorporates well-defined routes to the building access, and an appropriate scheme of lighting is proposed.

Policy EC1 identifies the land outside of the Central and Bay Business Areas that is designated for Use Class B (Business, General Industrial and Storage and Distribution) employment generating uses. Cardiff Port (EC1.2) is identified under this policy. Policy EC3 provides the policy framework that aims to protect the designated land for Use Class B employment. The criteria listed under the policy are provided in Section 2.

The proposed development is Use Class Sui Generis. However, it would create a minimum of 10 FTE positions of employment on land that is identified for employment. This number is comparable to that which would arise from a B2 Use (General Industrial) on the site. These positions of employment would be associated with the general running of the facility (training, security, catering and administration). The development would also train 70 reservists at any one time who would receive pay and travelling expenses for every drill night and weekend, pay equivalent to regular rank when on operations and receive a yearly bonus following completion of service.

The delivery of the development would not prevent the employment uses, which are currently located on and adjacent to the site, from continuing to operate. ABP is exploring opportunities to relocate both County Marquees / Cardiff Fuel Centre and Atkin Trade Specialists to other land within Cardiff Port. It should also be noted that County Marquees is staffed by a single individual and that the Atkin Trade Specialists premises is a satellite facility (the main premises is located elsewhere in Cardiff Port). Although not employment uses, discussion has also been ongoing with the Cardiff Sea Cadets and Maritime Volunteer Service, who would be retained on an adjacent site to the development.

The development would also not prevent companies located within the Port area from continuing to operate. A noise survey of the existing noise levels at the development site has been undertaken, and the building has been designed accordingly to ensure that exisiting companies could continue to operate without disturbing users of the new development.

Neither would the development prejudice the potential future use of the site by a use falling within Use Class B. The development would deliver sufficient access and parking infrastructure that could be utilised by future occupiers, and the building, which has a design life of 60-70 years, has been designed so that it could be adapted by future users if no longer required as a training facility.

Finally, the development site is 0.97ha. ABP's total land ownership is 146.7ha of which 126.10 ha is operational port land where Use Class B employment generating uses are located. The development site therefore equates to only 0.77% of the operational port land and use class B employment generating users would continue to operate on the remaining 99.23%.

Given that the development would generate employment, would not prevent the future use of the site for Use Class B employment and would not prevent the existing businesses on the site from continuing to operate in the area it is considered that the development complies with policy EC1 and EC3.

Conclusion

The proposed development complies with the requirements of national policy and the Cardiff Local Development Plan. It is therefore considered appropriate to grant planning permission.

Planning Statement

6. Conclusion

This Design and Access Statement explains the design approach that has been applied to the proposed development of the HMS Cambria training facility; demonstrates the steps taken to appraise the context of the development; and, explains the policy or approach to access and how policies relating to access have been taken into account. It is therefore in accord with the requirements of Technical Advice Note 12.

This DAS also demonstrates that the design of the development is suitable to the proposed use, high in quality and in accord with national and local planning policy. It also demonstrates that the development would not be at risk from flooding and would not have an unacceptable impact on ecology, the local highway network or the amenity of adjacent uses. While it is identified that the proposed development would result in a change of land use from allocated employment land, it is considered that the impact of this would be minimal since the site will create employment (albeit not based in industry), existing employment uses will be relocated elsewhere in Cardiff Port and the site only represents 0.77% of existing port use. On balance therefore it is concluded that the proposed development complies with national and local planning policy and it is respectfully requested that planning permission be granted.