



Adroddiad

Ymchwiliad a gynhaliwyd ar 17/6/03

Ymweliad â safle a wnaed ar 10/6/03

Report

Inquiry opened on 17/6/03

Site visit made on 10/6/03

gan/by P J Macdonald MSc ARIBA MRTPI

Arolygydd penodwyd gan Cynulliad
Cenedlaethol Cymru

an Inspector appointed by the National
Assembly for Wales

Dyddiad/Date 27 11-2003

TOWN AND COUNTRY PLANNING ACT 1990
ANCIENT MONUMENTS AND ARCHAEOLOGICAL AREAS ACT 1979

CARDIFF COUNTY COUNCIL

APPLICATIONS BY CARDIFF COUNTY COUNCIL
VISITOR FACILITIES AT CARDIFF CASTLE

Cyf ffeil/File refs: Z6815/X/02/514285: 514286: 514287: 514288

Site Address: Cardiff Castle

- There are four applications, two being planning applications and the other two being applications for scheduled monument consent. The planning applications were called in for decision by the National Assembly for Wales by a direction made under section 77 of the 1990 Act on 8 November 2002.
- The applications are made by Cardiff County Council.
- All the applications are dated 9 April 2002.
- The development proposed is a visitor centre, café and shop at Cardiff Castle
- The reason given for making the direction was that the planning issues were so closely related to those pertaining to the scheduled monument consent already before the Assembly for determination that the planning applications should be called in so that all the applications might be determined concurrently. This was considered to be consistent with the advice and policy set out in paragraphs 8 and 77 of Circular 61/96.
- On the information available at the time of making the direction the following were the matters on which the Assembly particularly wished to be informed for the purpose of its consideration of the applications: - a) National policy in PPW and Circulars 60/96 and 61/96 relating to the preservation of archaeological remains, listed buildings, and historic parks and gardens and their setting: b) relevant policies in the development plan: c) the impact of the development on scheduled archaeological remains, the fabric and setting of the Grade 1 Listed building, and the historic park and garden and its setting: d) insofar as the SMC applications are concerned, whether there are grounds for setting aside the presumption against the works.

Summary of Recommendation: these applications should be refused for the reasons given

Procedural Matters

1. The inquiry sat on the following dates: 17, 18, 19, 20 June, and 16, 17 and 18 July 2003. A list of those appearing to give evidence is appended to this report. The Council gave evidence in support of the proposals, and the Ancient Monuments Society and Cadw appeared as objectors. That part of the AMS evidence relating to the C18 landscape also represented the views of the Georgian Group. A full accompanied site inspection was carried out in advance of the opening of the inquiry, with the agreement of all parties, on 10 July 2003. Unaccompanied visits were made as required.
2. The first planning application relates to the visitor reception building, the Council's reference number being 02/823/C. The corresponding scheduled monument application is A-CAM1/2/0938/32. The Planning Inspectorate's reference for the planning application is Z6815/X/02/514285, and for the SM application it is Z6815/X/02/514287. The second planning application is for the café/shop building, for which the Council's reference number is 02/824/C. The corresponding scheduled monument application is A-CAM1/2/0938/31. The Planning Inspectorate's reference for the planning application is Z6815/02/X/514286, and for the SM application it is Z6815/02/X/514288.
3. Cardiff Castle is both a Grade I listed building and a Scheduled Ancient Monument, although the boundaries of the two designations are not identical. Scheduling is, of course, deemed to take precedence over listing. Whilst there might be some small part of the works outside the scheduled area, it was agreed with Cadw before the inquiry that, for present purposes, the whole should be treated under ancient monument rather than listed building legislation, although listed building policies still, of course, applied. This approach was accepted by all parties to the inquiry. Appropriate conditions to be attached to any scheduled monument consents were discussed at the inquiry, as were those relating to any

planning permissions, and I comment on both below. This does not, of course, obviate the need for Cadw to ensure compliance with any relevant procedural requirements of the regulations, since SMC is governed by other legislation than that in respect of planning applications.

4. In addition to the status of Cardiff Castle as a Grade 1 listed building and a scheduled ancient monument, it is also situated within a Registered Historic Park and Garden, and located within the Cathays Park Conservation Area (Document W2, App 1 and App2).
5. The Council, as Local Planning Authority, had considered the status of the application proposals under the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999. The works were considered to fall within Schedule 2, Urban Projects, and since the site is in a sensitive area (scheduled ancient monument) a screening option was carried out and a screening opinion given. Given the extensive information available, it was concluded that an Environmental Statement was not required. No party to the inquiry disputed this opinion.
6. A S106 Unilateral Undertaking in respect of public access tendered by the Council was withdrawn before the inquiry opened.

The Site and Surroundings

7. Since both the castle itself and the wider environment of Bute Park are very fully described in the listing description in the former case and the description in the register in the latter case, a relatively brief description is appropriate here (Documents W 1, App3 and W2, App1). The castle occupies a prominent city centre site, fronting Castle Street and Duke Street to the south, and North Road to the east. The principal shopping areas are to the south and east, with parkland extending up to the castle walls to the north and west, and the civic buildings of Cathays Park to the north-east. These latter buildings, together with the castle, form the core of the extensive Cathays Park Conservation Area.
8. The rectangular ground plan of the castle reflects its origins in a C3 Roman fort, the fourth to stand on or very near this ancient site. The site was re-used by the Normans, who erected the motte in the north-west sector of the fort's interior. This motte, together with its C12 stone shell keep, are prominent features of the Castle Green, the open space within the outer walls. Further building took place in the later medieval period, including the apartments built against the western wall (the western apartments), and other free-standing structures within the Castle Green, the latter being divided into an inner and outer ward by a wall.
9. Considerable changes took place in the C18, when Henry Holland re-modelled the living accommodation for the Bute family, and Capability Brown landscaped the precinct, removing the ward wall and the free-standing buildings. More widespread change began in 1869, when the 3rd Marquis of Bute, with William Burges as his architect, began an extensive remodelling. This resulted in the famous suite of Victorian Gothic rooms within the western apartments that comprise the "Burges mansion", which remains a major visitor attraction today. Changes were also made to the C18 landscape, including a general lowering of ground levels within the Castle Green. The remains of the Roman outer walls were uncovered in 1889. Further changes took place under the 4th Marquis, including the re-construction of the Roman walls, which gave the northern, eastern and south-eastern exterior walls of the castle their present appearance by the 1920's. The castle passed from the Bute family into the ownership of the Council in 1947.
10. Visitors enter the castle today by the main (south) gateway fronting onto Castle Street (there

is a re-constructed Roman gateway in the north wall but it is normally kept locked). There is a ticket office, and a toilet block in free-standing buildings to the right of the gate when entering, together with a small shop in the base of the Barbican Tower (built 1924-5 to provide guest accommodation). The main feature of the view northwards across the Castle Green is the motte and the keep. Tours of the Burges mansion may be made by mounting a flight of steps against the south-west wall, leading to a high level walkway. There are two military museums, that of the Queen's Dragoon Guards to the right of the main entrance, and that of the Royal Regiment of Wales in the Black Tower to the left of the entrance (when entering). There is a café at semi-basement level in the western apartments. The Castle Green is generally grassed, although some (non-public) car parking takes place on hard surfaces within the south-western part of the precinct. Occasional major public events take place within the Castle Green. There is an extensive detached stable block to the north of the castle, but it is not in the Council's ownership.

Planning Policy

11. National policy can be found in Planning Policy Wales (2002), Chapter 6 of which deals with conservation of the historic environment. The document recognises also the role of tourism as a major element in the Welsh economy, and has the objective of encouraging sustainable tourism (Chapter 11). Technical Advice Note 12 deals with design, including design in the context of the historic environment, and TAN13 addresses tourism. Circulars 60/96 and 61/96 deal respectively with planning and archaeology, and planning, historic buildings and conservation areas.
12. The development plan consists of the South Glamorgan (Cardiff Area) Replacement Structure Plan 1991-2011 (adopted April 1997), and the City of Cardiff Local Plan (adopted January 1996) (Documents C1/C/22 and 23). Relevant policies of the Structure Plan include: B1 (Conservation of the Built Environment); B3 (Educational/Recreational/Tourism Potential); T1 (Tourism and Recreational Development); and MV13 (Equality of Access). Relevant Local Plan policies include: O1 and O2 (ancient monuments and archaeology); O3 and O4 (conservation areas and historic landscapes); 11 (design); 07, 43, and 45 (open spaces and recreation); and 20 (provision for special needs groups). (See also paragraph 64 below).
13. An emerging plan is the Cardiff Unitary Development Plan 2002-16, likely to go on first deposit in September 2003. The Council does not consider it to have any status in the present context, and preferred at inquiry to rely on the policy provisions of the current plans.
14. The City Centre Strategy 1998-2002 (St Mary Street area) has the status of supplementary planning guidance. Improvements to the castle are a specified project in the plan and also in its draft replacement (2002-2006), currently out to consultation (Documents C1/C/23 and 24). (See also paragraph 65 below). A City Centre design guide was produced in September 1994 (Document C1/C/25): Policy 10 refers to environmental quality, particularly where conservation areas or listed buildings are concerned. The Conservation and Management Plan for the Castle (Core Document CD1), does not have the status of supplementary planning guidance, and I was unable to find what Council resolutions, if any, exist in relation to it.

Planning History

15. A list of relevant planning and listed building applications going back to 1991 will be found at Document C20, when visitor centre facilities were proposed, but the application was withdrawn before determination. In July 1997, planning permission was granted for a

single storey visitor centre to the right of the main gate, on the position occupied by the ticket office. This building was smaller than the combined floor area of the present proposals, and did not contain a restaurant. It did not provide disabled access to the upper level, and hence to the Burges mansion. Funding by the Heritage Lottery Fund was not secured, and the scheme did not proceed.

16. A number of development projects are currently in progress at the Castle, and details will be found at Document C13.

The Proposals

17. As a result of consultations and discussions with various interested parties, amendments were made to the application proposals as originally submitted, and amended drawings were received on 13 January 2003. These drawings are attached as plans numbers 13 to 20 (visitor centre) and 21 to 25 (café/shop), together with the landscaping drawings, plans 26 and 27. The drawings submitted with the original applications in June 2002 will be found at Documents C10 and C11.
18. The architect, Niall Phillips, included a detailed description of the current scheme proposals in his proof of evidence, and this is attached as Document C18. Hence, only a brief description need be given here. The application proposals envisage two separate buildings: a visitor centre situated immediately to the east of the main entrance, and a café/shop building close to the south wall, to the west of the entrance and below the high-level walkway giving access to the Burges mansion.
19. The visitor centre is intended to provide for ticket sales and information, together with an audio-visual interpretation theatre, exhibition galleries, and disabled access to the level of the upper walkway giving access to the Burges mansion. The design approach has been to minimise the visual impact of this largely windowless building by setting it into the grass bank that exists against the inside face of the south-east wall, and wrapping a northward extension of the grass bank around its built volume. This aims to merge architectural and landscape forms to conceal the scale and visual mass of the building. A double-height foyer would give access at ground floor level to the ticket/information desk, toilet facilities, stairs, disabled lift, and to the orientation gallery. A staff room, storage, and plant room would also be found at this level.
20. At first floor would be the audio-visual theatre (or interpretation centre), together with both military museums, and additional exhibition space. At the next level the building would link with the Barbican Tower (through a doorway converted from an existing window) and hence from there to the walkway giving access to the Burges Mansion.
21. The audio-visual theatre would be an irregular polygonal building, faced in ashlar, 15m by 8m in plan and 8.5m high, only the upper part of which would project through the curved earth banking. The military museums (one within existing fabric), orientation gallery, services and plant rooms, being windowless, would lie entirely within the banking. The entrance foyer would have planar glazing at both ground and first floor levels, flanked by horizontal timber cladding. The new grass embankment would cover an area of about 30m by 50m on plan. It would generally not exceed 7m in height, except for one small area 8m high. The lift tower would have a maximum height of 10.5m, which would be about 0.85m above the castle wall: it would not be visible from outside the castle to the south (Document C12).
22. The single storey café/shop would be a rectilinear, free-standing building, which would have a footprint of about 450 sq.m. (a reduction on the original scheme of 610 sq.m., which

also included toilets) and would be some 3.5m high. It would be clad in horizontal oak boarding, with extensive glazing to the long north and south facades. The low pitched roof would be clad in lead (not grassed as originally proposed). Full access would be provided for the disabled.

The Case for the Council

The material points were:

The Context of the Present Proposals

23. The application proposals were intended to conserve and sustain the castle as the Council's most treasured historic site, whilst also providing for greater public access and enjoyment. There was no conflict between these two aims, and what was sought was sustainable conservation which balanced the needs of the past and the future. This followed from the principal conservation policy in the Conservation and Management Plan (hereafter CMP) which was: "to maintain and enhance the significant fabric and historic setting, to increase knowledge and understanding of the castle and to foster appreciation by the visiting scholar and general public in a way that will contribute to the significance and sustainability of the site in the 21st century." There was an ongoing 15 year programme (to 2016, and costing in excess of £16 million) of conservation and restoration, supported by the Heritage Lottery Fund.
24. The CMP was not a planning document, and could not be used in the determination of these applications as if it were part of the development plan. It had achieved what was perhaps undue prominence in the present case because the objectors claimed to support it, and also claimed that the present proposals departed materially from it. This was misconceived. The document was developed in 1999 as part of an on-going process, and was never intended to be definitive. Its policies and principles had been developed and carried forward subsequently, in a climate in which the financial and organisational constraints imposed were less stringent than in 1999. The CMP was not clearly based on an increase in future visitor numbers, for example, and it assumed that the major public events within the castle would continue. The present proposals assumed an increase in visitor numbers, and the removal of major public events, with the need to replace the substantial income that these generated (they would still generate income for the castle, but it would be less when such events were relocated to Bute Park). The objectors laid stress on the sketch scheme for a visitor centre included in the CMP, but this was only an outline proposal, and was not based on a detailed brief resulting from an analysis of need.
25. In terms of the problems that needed to be faced, the main concern was the condition of the building fabric of the Burges mansion, and this was being addressed as part of the 15 year plan. As far as visitor facilities were concerned, problems included: poor access for the disabled, with many parts of the site inaccessible to them: education facilities were almost non-existent: interpretation of the complicated 2000 year history was inadequate: visitor facilities generally were inadequate for such an important site (for example, ticket queues had to wait outside in the rain: the shop was tiny: the café was small and had poor access). Large scale uses, eg hospitality, concerts, weddings, produced revenue which was economically important, but they could create their own problems, eg erection of marquees or staging, demand for car parking, intrusion by large vehicles, limitations on other visitors, etc. The present proposals were intended to address these problems, and were an essential part of the achievement of the 15 year plan and its aspirations, and hence a contribution towards a sustainable future. A key element was to make the Castle Green free of charge to

casual visitors, and to open the north gate so as to re-unite the castle with Bute Park.

26. The 15 year plan had been developed with specialist inputs, for example from Stephens Associates in respect of the overall strategy, and from Fumeaux Stewart as interpretation designers. Niall Phillips was appointed as architect after a rigorous selection process, and he re-examined the brief with the client team and other consultants. The need for the required visitor facilities to be in new buildings arose from the nature of the existing structures and the lack of the out-buildings and stables which were often available at other historic sites. Both the castle's curator, the historian Matthew Williams, and the Council's landscape architects had been fully involved in the project, including consideration of the impact on the historic landscape and setting. In view of the archaeological sensitivity of the site, geophysical surveys and boreholes were commissioned, Kevin Blockley was appointed as consultant, and experts were consulted, including Dr Peter Webster of Cardiff University, who had previously carried out excavations at the Castle. As a result of these and other consultations, amendments were made to the original proposals, resulting in the present scheme, which was thus a fully researched and well-considered proposal set within the context of a wider 15 year conservation programme.

The Strategic Vision and Visitor Management

27. The importance of tourism to the Welsh economy was well recognised, for example by Planning Policy Wales, and Cardiff was one of the main tourism drivers, and designated as a "Strategic Tourism Growth Action Area" by the Wales Tourist Board. Tourism spending in Cardiff was worth £433.6m in 2000, and supported around 13,000 jobs (PT and FT). In 1999/2000, the castle had 167,810 visitors (down from 172,773 the previous year) or 11.2% of the total number of visitors in the Council's area. It was under-performing in visitor numbers compared with comparable properties in the UK, and it was more difficult to compete now entry to museums was free. There was significant scope to increase levels of market penetration, particularly among day visitors to the City: only 2.4% of such visitors currently visited the castle. Given its quality and location, it had the potential to do better.
28. The Council wished to realise the potential of the castle as both a tourism and community asset. Whilst some owners of historic properties were either conservation-based (eg Cadw) or income focused (eg the Tussaud Group at Warwick Castle), the Council had multiple goals, and had to secure a balanced set of objectives in a sustainable manner. Each of these objectives was founded upon the long term conservation of the castle but without other activities, especially the generation of income, conservation work might not be sustained. A subsidy of around £200,000 per annum was currently necessary from the Council, and the proposed relocation of major events would reduce income. Sustainable conservation must always be underpinned by income, and increased public access would generate income whilst increasing public interest and support for conservation objectives. Cadw had just opened a new visitor centre at Caerphilly Castle, a very visible modern structure within the historic walls of the castle, with increased revenue being among its objectives.
29. Visitors were becoming more discerning and demanding as a result of increased expectations in respect of, for example, food, retailing and toilet facilities. Also, enhanced educational and interpretive facilities were required, particularly if appeal was to extend beyond the A/B/C 1 market that was the traditional basis of cultural tourism. The history of Cardiff Castle was particularly rich, and it had to be recognised that a wider visitor constituency would be less likely to have prior knowledge, and would need to gain that knowledge quickly to derive benefit from a visit. More aggressive marketing and regular activities were needed, and the physical barriers (external walls, traffic, etc) needed to be

overcome by opening up the castle to the city centre and the parkland. Hence the intention to open the Castle Green freely to visitors and to manage both the castle and its surrounding parkland as public space, thus increasing footfall and awareness. The potential market for paying visitors could increase to 317,500 by 2005, including school visits, group visits and events. Up to 80% of this potential could be realised, giving 254,000 actual paying visitors. This would not represent aggressive growth, and was consistent with environmental capacity. From these figures were derived the visitor flows used as the basis for the project design.

30. The traditional approach to interpretative facilities in Wales was somewhat staid, and Cardiff Castle offered the opportunity for a more imaginative and innovative approach. It would be film-based, with a 6 minute film shown 8 times per hour in a 30/40 seat theatre. This represented an efficient use of space, compared with more traditional exhibition techniques, the theatre having a footprint of only some 145 square metres, whilst allowing for the visitor numbers envisaged. Other facilities would include a Burges exhibition (the Council had drawings and textiles by him, which could not currently be displayed), and the display of artifacts connected with the castle (including those from the archaeological digs of the 1970's and 1980's which, again, could not currently be displayed), as well as the military museums. From the visitor centre, visitors could proceed to historically themed zones within the site, including areas at present inaccessible to the public, eg the intra-mural walks. Thus, dispersion around the site would prevent undue pressure on any one area, particularly the Burges mansion, where space limitations would prevent any substantial increase in visitor numbers. An increased visitor "dwell-time" of around three hours was envisaged, which would allow for both increased income and greater visitor understanding.
31. The objectors had questioned the provision of facilities for the military museums, but these were linked historically and thematically with the castle. The Royal Regiment of Wales, whose museum had relocated to the castle from Maindy Barracks in 1978, was the lineal descendant of the Glamorgan Militia, traditionally commanded by the Butes. The regiment's formation, by the amalgamation of two existing Welsh regiments, had taken place in 1969 at a ceremony on the Castle Green before the Prince of Wales. Relocation from its present museum was necessary to facilitate disabled access to the Burges mansion. The First Queen's Dragoon Guards, whose museum relocated from Shrewsbury in 1987, was 80% Welsh ("the Welsh Cavalry"). They would be accommodated within the existing fabric. The castle's primary historic role was, of course, defensive, and it had been at the heart of military life in the city in World War One, when 34 battalions were raised. The museums' presence was an appropriate and attractive visitor facility, and they provided displays and re-enactments on the Castle Green during the summer. Both had unexpired leases.

The Application Proposals

32. Following research and appraisal work by Stevens Associates and Furneaux Stewart into the visitor market and the castle's potential, and the development of an interpretation strategy, the 15 year plan was developed (Core Document CD6). In turn, the space and functional brief for the new visitor facilities were developed by the architect in consultation with the project team. The sketch scheme in the CMP could not be used as a starting point, as the plan itself was unclear as to whether or not an increase in visitor numbers was to be accommodated. The inclusion of such a scheme in the CMP was premature, since it was not based on a proper brief, and was functionally inadequate in some respects, eg the lack of disabled access.
33. The key functional elements identified in the briefing process were: a) reception foyer

including ticket sales, information and audio tour guide point capable of accommodating some 2000 visitors per day; b) an exhibition space also acting as holding area for the audiovisual presentation; c) audio-visual presentation space capable of accommodating a peak visitor flow of 216 visitors per hour, perhaps rising to 375 vph.; d) post-presentation exhibition space; e) exhibition space for military museums with equivalent floor space to that which they currently had; f) exhibition space for Burges exhibition; g) retail sales area; h) café; i) cloakrooms, toilets, staff welfare facilities, plant and service rooms; j) circulation. The space requirements of each element of the brief were then calculated using a standard architectural source (The AJ Metric Handbook). This came to 1520 square metres gross internal area, assuming that the Roman wall gallery and the QDG museum would remain where they were (hence they were excluded from that figure), but that the Royal Regiment of Wales museum would have to be relocated to allow disabled access.

34. The application scheme was of 1590 square metres, ie about 4.69% above the theoretical minimum figure, which indicated that the brief had been fulfilled in an economical manner. It soon became apparent, however, that to provide this level of accommodation in a single building would be inappropriate in such a sensitive location. Also, the retail and café facilities should be accessible to both paying and non-paying visitors, and should not congest the main foyer space. Stress was laid on disabled access facilities.
35. The principle of some development to provide visitor facilities was not opposed by any of the objectors. The CMP had already concluded that the optimum location for any new-build visitor facilities would be immediately to the east of the main gate. Nevertheless a further, more detailed, appraisal was undertaken as part of the present proposals, and 8 potential sites (A to H) were evaluated (the extract from Mr Phillip's proof setting out the findings is at Document C19). The conclusion was that Site A - east of the main gate - was the most suitable, confirming the view of the CMP. If two buildings were required, Site B - west of the main gate - was also a potential location, provided that the design took account of constraints on scale and site planning identified in the appraisal. All other sites were discounted for the reasons given in the appraisal. Site A was thus identified for the main visitor facilities, with Site B for the café/shop which would serve the Castle Green only, not Bute Park.
36. Site A was immediately to the east of the main entrance, in the area of the existing ticket office, in an area visually muddled by uninspiring modern buildings of the 1960's and 1970's and the Barbican Tower of the 1920's. Development here would not have any significant impact on the historic landscape as a whole, particularly when seen from the main entrance and would not be visible from outside the walls. There had already been significant disturbance of the archaeological levels during the works in the 1920's and later. Existing services here could be re-used, minimising further excavation. Only here would it be possible to incorporate a lift giving disabled access to the upper levels of the existing buildings. Finally, its proximity to the main entrance made it functionally suitable as a location for visitor reception and ticket sales.
37. Site B was to the west of the main gate, in front of the wall supporting the upper walkway giving access to the Burges mansion. It was an area where stables and workshops had existed from about 1870 until about 1912 and, because of its functional nature, had always been screened from longer views by intervening landscaping from the main carriage drive. The adjoining bank had not been lowered when the general area of the Castle Green was lowered in the C19, because to do so would have destroyed trees screening the service area. The walkway above, giving views into the service area, was used in the C19 by male servants rather than the family. When in the early C20 a family nursery was built

overlooking the area, the service buildings were removed. The area was currently used for car parking, and hence no historic landscape features survived. The archaeology in this area was disturbed by C19 works. A single storey building here would not have a detrimental impact on the traditional views of the Clock Tower. This location was considered appropriate for the café/shop building.

38. The design approaches taken to the two buildings differed, reflecting their differing characteristics and locations. With the visitor reception facilities on Site A, the approach taken had been to minimise the apparent visual mass by wrapping an extension of the existing grass embankment around the built volume and only exposing the minimum amount of external fabric, mainly the elevations requiring natural light. The extension of the embankment, together with the removal of unsightly 1960's and 1970's buildings, would integrate the building into its setting. By contrast, the café/shop would be a long, low freestanding building, visually lightweight and extensively glazed. Strengthened landscaping on the existing grassed bank to the north would provide visual screening from the Castle Green generally. (The architect's more detailed description of both buildings is at Document C18).
39. Consultations as part of the design process led to a number of design changes, the main ones being: a) the raising of the slab levels of both buildings by 250mm to minimise impact on the archaeological levels: b) the location of the café/shop was modified, and the building reduced in size to avoid the grass bank to the north and to avoid visual conflict with the steps to the upper walkway: c) amendments to landscaping design: d) change of the grassed roof surface proposed for the café/shop to lead: e) modifications of the elevations of the audio-visual theatre projecting above the banking.
40. No modifications would be required to the existing historic fabric dating from before 1890. External alterations to later fabric would be limited to lowering the cill of the east window in the 1920's Barbican Tower to allow for a doorway needed to permit disabled access to the upper level. Internal alteration would be limited to minor ground and first floor changes within the Barbican Tower, and to the 1920's mural gallery to improve visitor access to the Roman wall. The Barbican Tower was neither listed nor scheduled, and Cadw had expressed no concern about this aspect of the proposals. Demolition would be limited to minor 1960's and later structures of no merit. The café/shop would not impinge physically on the existing historic buildings at all.
41. This was in essence a conservation project, and the objectors were incorrect to seek to make a distinction between demand-led and environment-led approaches. The brief stemmed from an analysis of visitor demand, and it would be absurd to build something that was inadequate to meet that demand. The question was whether the impact of the resulting building was environmentally unacceptable: the Council's view, as both client and planning authority, was that it was not unacceptable.

Archaeological Implications

42. An archaeological assessment was carried out based on information derived from the following sources: excavations by Dr Peter Webster of Cardiff University in the period 1974 to 1981, including unpublished material: geophysical surveys: boreholes: and archaeological watching briefs on works undertaken in the area. In addition, a panel of experts was convened, and met on several occasions with valuable results. Additionally, as noted above, the initial design was modified following consultation, the ground floor slabs being raised by 250mm to minimise archaeological impact, and the footprint of the café/shop building revised.

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43. The ground level of the Castle Green was lowered in the C19, removing Late Roman levels over large areas of the former Outer Ward, and resulting in a shallow depth of material over surviving archaeological deposits. Roman and medieval remains were recorded during work by the Butes between 1889 and 1923, and extensive work to rebuild the south wall in the 1920s resulted in significant destruction of the Roman and medieval bank material in this area. What survived would have been stratigraphically divorced from its contemporary stone wall. Later construction of the ticket office and other structures to the east of the main gate caused further destruction in this area.
 44. Overall, the previous archaeological work already described indicated complex and significant archaeological remains from various periods surviving at varying depths in all areas of the castle. These deposits were clearly significant and well preserved, and were ranked as being of national significance, and there was a presumption in favour of physical preservation in-situ, although that had to be weighed against other factors, including the need for development.
 45. The archaeology beneath the existing ground level in the area of the proposed visitor centre was preserved at depths of between 150mm and the natural clay at 900mm to 1.3m (sloping east to west). The building foundations would cut to a depth of 250mm, so that about 100mm of archaeology would be removed in this area. This was likely to be medieval and postmedieval rather than Late Roman, and would require excavation before building work commenced. Within the existing bank, surviving Roman and medieval material would be removed by the building, although the archaeological significance of the surviving material was greatly reduced by the disturbance in the 1920's. Of the 370 metres of surviving bank around the south, east and north walls, the area to be excavated represented just 10% in plan, and less than 5% in volume.
 46. The café/shop building had been modified to avoid the two surviving areas of raised medieval banking to the north. Impact had, therefore, been reduced to the removal of a section of the grassed area between these two areas. The known archaeology was generally 300mm below the ground level, and would not be touched by foundations 250mm deep. The remainder of the building would be on an area of car parking, which would have been disturbed to around 300mm to 400mm, and hence deposits below this level would be untouched. A recent watching brief confirmed medieval levels at 300mm below ground level, with Late Roman deposits at 1.5m depth.
 47. A mitigation strategy had been put forward which, if followed, would minimise any risks to currently unidentified deposits, and ensure proper recording. In view of the revisions already made to foundation levels and to café/shop building footprint, all the archaeological consultees, with the single exception of Cadw, now raised no objection on grounds of effect on archaeological remains. Even Cadw had conceded at inquiry that the case for refusal based on effect on archaeological remains was highly marginal in the case of the café/shop. As far as the visitor centre was concerned, Cadw would have accepted the physical impact on buried remains if they had not been concerned about the visual effect on the setting. The applicants' view was that the minimal impact on the archaeology, the arrangements for excavation and recording, and the degree of need for the new buildings should together outweigh the general presumption in favour of in-situ preservation in this case.

Historical Landscape Implications

48. The medieval and Tudor features of the Castle Green had been largely destroyed by the work carried out by Capability Brown between 1774 and 1796, which included the removal
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of buildings and the filling-in of the moat. Early map evidence from the period 1830 to 1851 showed few if any changes to the C18 landscape. A drastic reworking began in 1865, initially by Burges, then by Andrew Pettigrew from 1873. These works included lowering the general ground level to expose the inner ward wall, the re-excavation of the moat, and the formation of the steps to the keep in place of the spiral path up the motte. From the 1890's onwards to the late 1920's, exposure and re-building of the Roman walls affected the landscape by, for example, the removal of trees and of the tunnel, built by Brown, which formerly gave access for a coach to the land to the north, and hence to the stable block. Later changes included tree loss and, in more recent years, the intrusion of city centre development beyond the walls into the wider visual setting.

49. The resulting landscape consisted of layers of development over time, and could truly be described as a palimpsest. Whilst many characteristics of the Capability Brown landscape remained, the great majority of the features had been seriously eroded or compromised. This view did not go quite so far as that of the CMP, which regarded Brown's work as having been eliminated. The new towers by Burges and the reconstructed Roman wall had created a more enclosed and hard boundary to the Castle Green than existed in the C18. The smooth flow of the lawns had been interrupted by excavation of the line of the inner ward wall, and the reexcavation of the moat. The spiral path up the motte was interrupted by the flight of steps. Many of these changes were irreversible. It was probably incorrect to describe the castle as the best surviving example of Brown's work in Wales.
50. Changes had also occurred to the work of Burges and Pettigrew, eg removal of climbers from the castle walls, loss of ornamental planting on the motte, low water level in moat. However, the Victorian character of the landscape could still be readily perceived, whilst by contrast that of Brown could only be described as significantly altered.
51. Analysis of the effect of the proposals on the historic landscape had led to a number of design changes. Firstly, whilst the location of the café/shop building on the site of former service buildings and yards was appropriate, its initial siting precluded re-planting of part of the shrubbery bank to the north which survived as a relic of the former ground level. The revised design allowed for the restoration of this historic shrubbery bank, which existed until about 1930. This would facilitate the new building's integration into the historic landscape, and reduce its visual impact from the north, particularly from the keep, and the building would largely disappear from view within about 5 years. Secondly, some changes were also made to the visitor centre area to allow a more smoothly flowing route from the drive around the building, and a gentler turf slope. The climber planting to the upper part of the building was modified to use ivy, thus reinstating one lost element of the historic landscape character of the castle. Finally, minor changes were made to the specimen tree planting in response to the historic evidence. These changes had been welcomed by the Victorian Society (letter of 22 January 2003).
52. An assessment had been made of the residual impact of the proposals on the historic landscape by preparing photomontages, using accurate three dimensional computer models and based on known historic viewpoints (Core Document CD16). These showed that the proposals avoided direct physical impact on the surviving elements of the historic designed landscape. The one exception was that the northern part of the visitor centre building would require the realignment of a circuit path which had a concrete block surface but probably followed Brown's line. The new building would preclude the accurate restoration of this path but this was a small price to pay for the benefits it would deliver. In addition, the removal of car parking and major events would constitute significant visual benefits in

landscaping terms. It was considered that the impact of the proposals on the historic landscape would be more than balanced by the significant benefits derived.

Visual Impact Assessment

53. The proposed works would not be visible from outside the castle walls, as was demonstrated by the montages showing a number of viewpoints in Duke Street, Castle Street and St Mary's Street, which showed that even the roof of the lift tower would not be visible from these points (Document C12).
54. The effect on views within the castle walls was apparent from the photo-montages (Core Document CD16), representing the views from the most important historic viewpoints within the Castle Green. These showed existing views, and views after 5 years of vegetation growth. The most important views were from:
- 1) Viewpoint 2: from the main door of the western apartments. The visitor centre would not compromise views of the Black Tower and Burges' upper walkway, and the existing Holm Oak would effectively screen the new building. The existing view showed that the present ticket office was visible from this point. The café/shop building would be effectively screened by the new planting on the intervening grass bank, and the building would be less visually intrusive than the cars currently parked in the area.
 - 2) Viewpoint 3: from the south-east corner of the outer wall. Existing planting would largely obscure the upper part of the visitor centre: the view of the east front of the western apartments would be no more obscured than at present. The café/shop building could not be seen from this point.
 - 3) Viewpoint 4: from the keep. The present clutter of small modern buildings would be replaced by the controlled volume of the Visitor Centre, which would provide a better grouping, whilst impinging less on the north facade of the Barbican Tower. The fact that the building projected further north than the present structures would not be apparent from here. Only the roof of the lift tower would exceed the height of the crenellations of the curtain wall. The café/shop building would be largely obscured by planting, and the horizontal roofline would be well below the level of the wall walk. Comparison of the completed views with and without planting showed how effective the landscaping would be in integrating the new buildings into the scene.
 - 4) Viewpoint 5: from ground level near the north gate, looking south-west. The café/retail building would be largely obscured by planting, and would not impact on the visual dominance of the West Range, Clock Tower and South Gate.
 - 5) Viewpoint 6: same point, looking south-east. Essentially the same comments as those for Viewpoint 4.
 - 6) Viewpoint 9: from the top of the banking against the eastern wall. The visitor centre and its bank would have no impact on the composition of the Clock Tower and West Range, nor their visual counterbalance with the South Gate grouping. The simple form of the new building and the gentle curve of the bank would resolve the present visual clutter. The realigned bank would conceal most of the bulk of the new building, and help provide a seamless continuity between the existing bank and the flat areas of the Castle Green. Only the east end of the café/shop building would be visible from this point, the remainder being hidden by planting.

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55. It was accepted that there would be perceptible change to the visual environment and character of the South Gate area, although most of this change would be beneficial, and that new building fabric would be visible within the Castle Green. However, overall the visual benefits would considerably outweigh any disbenefits. The new buildings would be modest and discrete, contemporary yet not intrusive in their context.

National Planning Policy Context

56. The castle was subject to four historic environment designations. These were: a conservation area, scheduled monument, listed building, and historic park and garden. Each imposed its own requirements although, in the circumstances of this case, the first and the last were effectively subsumed by the other two designations, and imposed no additional tests. However, notwithstanding these designations, nothing in national planning policy or guidance would support the notion that change was therefore ruled out. A wide range of considerations had to be taken into account and an appropriate balance struck.
57. Planning Policy Wales recognised the Assembly's commitment to sustainable development, and the planning system's fundamental role in delivering it. The present proposal was in line with this thinking, being based upon sustainable conservation, and the increased revenue generation necessary to safeguard it. Paragraph 2.1.4 set out four objectives of sustainable development, and the next paragraph recognised that social progress, and high and stable levels of economic growth and employment needed to be balanced and integrated with protection of the environment and prudent use of natural resources. Paragraph 2.2.1 recognised that the planning process must take account of the full range of costs and benefits, including non-monetary ones, in making planning decisions.
58. Therefore, whilst the conservation of the historic environment of the castle was central to any decision, other matters, particularly the needs of people now and in the future in respect of social inclusion, education and leisure, must also be considered. Part of the castle's modern function was to serve as a national landmark, contributing to the economy and national pride and identity. Therefore, in addition to its preservation, it was necessary to encourage its use and understanding. This was central to the present proposals. Disabled access was important to ensuring equality of access and, as paragraph 4.3.5 of PPW recognised, should be aimed for even in historic buildings. This was also shown by the Cadw publication "Overcoming the Barriers: Providing Physical Access to Historic Buildings".
59. Chapter 6 of PPW dealt with conservation of the historic environment, and set out objectives at paragraph 6.1.1. However, paragraph 6.1.2 recognised that conservation of the historic environment was to be secured whilst ensuring that it accommodated and remained responsive to present day needs. Paragraph 6.5.3 clearly envisaged that there could be cases where physical preservation of archaeological remains in-situ was inappropriate. The present proposals, including archaeology, constituted an integral part of a scheme designed to ensure, in the context of a long term strategy, that the castle was protected and maintained whilst at the same time providing facilities appropriate to a site of national importance, and helping to ensure that funds were available for physical preservation. Paragraph 6.5.8 stated that applicants for work to listed buildings must demonstrate the necessity for any alterations. Little work to listed fabric was proposed, and that which was proposed followed from the demonstrated need for the present proposals.
60. Chapter 11 of PPW and TAN13 dealt with tourism, recognising it as a major element in the Welsh economy. The Assembly's objectives in paragraph 11.1.2 of PPW encouraged

sustainable tourism whilst safeguarding the natural, built and cultural environment. The present proposals recognised that conservation, tourism, economic regeneration and social inclusion (through physical and intellectual access) were all interconnected and that well-considered proposals could contribute to all of them. This was in line with the approach taken by PPW.

61. TAN12 dealt with design, and how good design could assist environmental sustainability, economic growth and social inclusion. Paragraphs 3.2 and 5.46 recognised the multidisciplinary nature of design, which supported the team approach taken by the Council so that all aspects were thoroughly considered. Designing in context was considered in paragraphs 3.13 to 3.24 of the TAN, with the key requirement of understanding the site. Such an approach was fully reflected in the present proposals. The need for equal access and the requirements of the Disability Discrimination Act were again stressed in paragraphs 5.5 and 5.50. It was to be noted that even the objectors had not generally taken issue with the design of the proposed buildings as opposed to the extent of accommodation provided.
62. More detailed guidance on planning and the historic environment was to be found in Circulars 60/96 (Archaeology) and 61/96 (Historic Buildings and Conservation Areas). Paragraph 10 of the former stated that the desirability of preserving an ancient monument and its setting was a material consideration in the determination of planning applications, and it followed that the range of issues set out above (from PPW and TANS 12 and 13) was also to be taken into account in applications for scheduled monument consent.
63. From paragraph 11 of Annex 1 of Circular 60/96, three tests emerged: 1) would significant damage be caused to a scheduled ancient monument? 2) had alternative locations been considered? 3) did the need for the development outweigh the presumption in favour of preservation? In the present case, there was no significant damage resulting, and alternatives had been considered and rejected. Hence there was, strictly speaking, no need to consider the third question. However, the Council's case demonstrated a strong need for the development on grounds including tourism, economic development and social inclusion.

The Local Planning Authority's View

64. The development plan, which was the starting point for decision-making in terms of Section 54A, consisted of the Replacement Structure Plan and the Local Plan. Relevant policies of the former were those promoting conservation of the built environment (B1): education and tourism (B3 and T1): and equality of access (MV13). Policy 01 of the Local Plan presumed against harm to ancient monuments, whilst Policy 02 sought the preservation of locally important archaeological remains. Policy 03 permitted development in Conservation Areas only where it preserved or enhanced their character or appearance. Policy 04 required development proposals in historic parks or gardens to respect the character, setting and historic value of such areas. Policy 07 protected open space, whilst Policy 43 sought its enhancement. Policy 11 sought good design, Policy 20 sought provision for special needs groups, and policy 45 sought to promote recreation and leisure facilities. Within the proposals map, the castle was allocated as public open space, subject to Policy 07.
65. The City Centre Strategy 1998-2002 was supplementary planning guidance, which sought to raise the profile of Cardiff as an international tourist destination. Improvement of the facilities at the castle was identified as a priority, with access (including disabled access) raised as a particular problem. The draft replacement Strategy 2002-2006, now out for consultation, stated the promotion of the castle as a goal. Specific mention was made of improved public access to Bute Park, and of the implementation of internal and external

development works at the castle, including visitor facilities. There was also a City Centre Design Guide requiring proposals to contribute towards environmental quality.

66. The application proposals were reported to Planning Committee on 26 February 2003, when it was resolved: "That the Welsh Assembly Government (the Planning Inspectorate) be advised that the Council has NO OBJECTION to the proposal, subject to the following conditions" (these are set out in Document C1/I/51).
67. The proposal to improve tourist facilities was viewed by the Local Planning Authority as an extension of the existing use, and there was therefore no conflict with the development plan in terms of land use policy. In terms of the City Centre Strategy, the improvement of such facilities was seen as a priority, so again there was no conflict. It also accorded with Structure Plan Policies B3 and TI, and with Local Plan Policies 43 and 45. These policies all offered considerable support for the proposals in terms of tourism and recreation. The conservation objectives were supported by Structure Plan Policy B1 and Policies 01 to 04 of the Local Plan. Disabled access would derive support from Structure Plan Policy MV13 and Local Plan Policy 20. There were no traffic or transportation objections, and (subject to a condition on monitoring of landfill gas and a notification of radon gas) no pollution control issues.
68. Extensive consultations were carried out on the original scheme, as a result of which the present, revised, scheme was submitted. In archaeological terms, these revised plans were considered by Cadw to reduce disturbance but did not overcome their objection. The Glamorgan Gwent Archaeological Trust, who acted as the Council's archaeological advisors on planning applications, had objected to the original scheme on two grounds; firstly, the impact on the archaeological remains and, secondly, the effect on the setting of a scheduled monument. The revised plans overcame GGAT's first objection, which was withdrawn. Their second objection remained. This was that the curvilinear shape and design of the visitor centre was in conflict with the rectilinear form of the Roman fort, and had an unacceptable impact on the setting of the ancient monument. They recommended refusal. The Council took the view that this was a matter of planning judgement falling within their own sphere of competence, and did not accept this recommendation.
69. From the consultations and all other considerations, the key issues were identified as the impact on the historic landscape, the impact on the scheduled ancient monument and the listed building, and the impact on the archaeology.

Impact on historic landscape

70. It was recognised that the proposals would have some visual impact on the historic landscape of the castle. Landscape changes had been continuous over time, and that evolution had continued post-Brown. The present proposals were seen as part of that process of change. Just as previous changes had reflected the needs and aspirations of their time, so the current proposed changes reflected the needs and aspirations of the present day, and were justified in terms of the present day need for facilities.
71. The proposed buildings would be located along the south wall, and their impact would be minimal. They were not considered to impinge on the square, fortified enclosure of the castle, or on the dominant feature of the motte and keep. Nor would they impact on the immediate setting of the house, or interrupt the central flat, open landscape of the Castle Green. They would not conflict with the philosophy behind Brown's landscape design. The visitor centre would be located in an area where modern buildings of no merit were located,

with part of the building occupying a grassed area with a footpath introduced by Brown but now surfaced in modern concrete paviers.

72. The main plank of the archaeological objections by Cadw and GGAT in respect of the visitor centre was that of the effect on the setting of an ancient monument, in particular the effect of the curvilinear form on the rectangular enclosing walls. Whilst the Roman fort had rectangular lines, the later landscaping, including Brown's, was of a soft, sweeping nature and the curved grass bank to the visitor centre would be sympathetic to that character and to that of the existing embankment. The rectangular element of the site's visual character was created in the period leading up to in the 1920's at the expense of Brown's landscape. It was historically inaccurate, in that the reconstructed Roman walls were too high. The Roman walls would have been much lower, and there would have been no open views across the interior, which would have been filled by a rectangular grid of roads and buildings. The objections were based on a selective view of the historical reality.
73. The café/shop would be on a car park on the former site of service buildings, and the planted mound to the north would be restored. The removal of the tarmac area and parking, and the reinstatement of the bank and shrubbery would provide considerable enhancement. Further benefits would accrue from the opening up of the Castle Green to a wider public in line with the City Centre Strategy, and from the display of interpretative material. No conflict was seen between the proposals and the appropriate development plan policies, particularly Policy B1 of the Structure Plan and Policies 03 and 04 of the Local Plan.

Impact on scheduled ancient monument/listed building

74. The 2000 year history of the monument had resulted in a possibly unique amalgamation of architectural styles from different eras. The present proposals had to be seen in this evolutionary context, and the resulting juxtaposition of styles. The accommodation required had been divided between two buildings to minimise impact. Various locations had been considered and assessed. The location of the visitor centre was in an area away from the main visual elements of the castle, and one which had previously been disturbed by ad hoc C20 development.
75. This was also where the 1997 planning permission located this facility, setting a planning precedent for a larger form of development here. This building had an area of 160 square metres, and would have projected some 25m northwards from the south wall, thus overlaying the Brown path to the north. The building would have been low key, at 4m high, but it would have been contemporary in style, with pitched roofs, and would have formed a stark contrast with the Barbican Tower and the setting of the SM. This scheme, nonetheless, had the support of the Victorian Society and the Civic Trust for Wales.
76. The form of the interpretation centre related directly to the faceted form of the Norman keep, and offered a simple, clean and honestly modern form of construction and material, whilst minimising visual impact on the setting of the ancient monument and listed buildings. The current setting along the south side consisted of a soft landscaped embankment against a backdrop of the battlements and the taller Barbican and Black Towers, and this character would not be fundamentally changed. The top of the lift tower would be only marginally above the battlements, and not visible from the streets outside. In addition, the exposed parts of the visitor centre, clad in greenery, would be a subservient element to the more dominant towers. Although the physical form would be evident the scale, derived from functional requirements, was not considered to have an adverse effect on the wider setting or character of the castle.

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77. The form of the shop/café building was also intended to be as discrete as possible, and it would not intrude into views of the south wall or interfere with the gallery above. The extensive glazing was intended to allow views of the Castle Green to the north and to allow the stonework of the castle walls to be viewed to the south. The horizontal emphasis would complement the uninterrupted length of the castle wall. In longer views, the building would not interfere with views towards the south wall or the Clock Tower. The building had been reduced in size and the roof amended as a result of the initial consultations.
78. The proposals were therefore regarded as satisfactory, and not in conflict with Structure Plan Policy B1, or Local Plan Policies 01, 03 or 11. The works were seen as part of the on-going evolution of the castle, and as furthering the City Centre Strategy. The scale of the proposals should be weighed against the need and the wider benefits for future conservation, inclusive access, education and tourism. When balanced against these benefits, no over-riding harm could be demonstrated.

Impact on archaeology

79. An archaeological assessment had concluded that, whilst preservation insitu was to be preferred, a successful mitigation strategy could be designed to protect deposits, in accordance with Circular 60/96. Foundation design options had been considered with archaeology in mind, and the advice of Dr Webster of Cardiff University was sought on the original proposals. He considered the bank in the south-eastern corner to be the most sensitive, with very disturbed material of great complexity, containing mixed layers from all periods including Roman. The proposals were revised to minimise archaeological impact, including the redesign of the café/ shop building, and the reduction in depth of foundation rafts by 250mm. These changes led to the present proposals. As a result of these changes, GGAT had withdrawn their original objection in respect of physical archaeological impact, but Cadw still objected on these grounds.
80. The strategy adopted had been shown to minimise the impact on the archaeological resource. The importance of that impact was unclear, since the opinion received from archaeological experts was divided and inconclusive. GGAT, RCAHMW and CBA did not object, whilst Cadw did. There was thus no overriding evidence that the deposits to be disturbed were of such importance as to warrant refusal of development. Paragraph 16 of Circular 60/96 stated that each case must be examined on its merits, weighing the intrinsic importance of the remains against the need for development. It was therefore concluded that the proposals were acceptable and that, with appropriate archaeological excavation and recording, implementation of the proposals would not result in any detriment to the archaeological resource.

The Case for the Ancient Monument Society (and, in part, the Georgian Group)

The material points were:

81. The exceptional interest and importance of Cardiff Castle was recognised by all parties to the inquiry. The AMS was sympathetic to the aspirations of the Council and applauded the stewardship of the castle and the conservation of its fabric. They did not question the need for proper facilities for visitors but, owing to the castle's national and international significance, there was a need for all decisions to be taken in the context of a profound and comprehensive understanding of the site. In formulating the present proposals, the Council had sought a substantial increase in visitor numbers, and had not given proper weight to the constraints imposed by the nature of the monument. The history and morphology of the site was well set out in Section 4 of the CMP.

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82. The Heritage Lottery Fund required that all applications for financial support for heritage projects should be accompanied by a conservation plan so that proposals were properly informed and independently assessed. A conservation plan was commissioned by Cardiff County Council, paid for by the HLF and produced by Ferguson Mann Architects, and published in January 2000, the accompanying management plan being published the following month. The HLF made an award for Cardiff Castle in July 2000 of £5.7 million, the biggest HLF grant ever made in Wales. About £4.9 million was for work to the Burges mansion, leaving some £750,000 for visitor facilities.
83. The Council had adopted many parts of the CMP, but had unceremoniously abandoned others. The AMS regarded the CMP as a fundamental document in the consideration of the present proposals. The Council referred to the "review and improvement" of CMP but, in fact, there had been no systematic review of the whole document, with consultation as part of the process. Cadw, for example, had not been consulted although they advised the HLF. It was accepted that plans needed reviewing, but this was normally at 5 year intervals. Nor had any review been undertaken by the plan's original authors. It was not clear what view HLF might take about the alleged need to improve a plan recently completed for which they had paid a considerable amount of money.
84. The current proposals were not based on sound conservation principles as advocated in the CMP. The AMS had no difficulties with the re-opening of the north gate to re-establish the historic links between the Castle Green and Bute Park, or the opening of the intra-mural galleries to the public, or with some new building for visitors to the east of the main gate. There was concern about the impact of increased visitor numbers on the fabric of the Burges mansion, which was currently visited by about two-thirds of all visitors. The scale of visitor numbers now proposed went significantly beyond that envisaged by the CMP, and followed on from the transfer at some time in 2000 of responsibility for the castle within the Council from the Economic Development Department to the Special Projects Group. The numbers now sought did not give proper weight to the constraints imposed by the nature of the site and its capacity to accommodate visitor impact acceptably in conservation terms. Commercial considerations had been given too much weight at the expense of conservation, and there had been a failure to give "special regard" to the desirability of preserving the setting of the listed building and the ancient monument.
85. The CMP saw the need for improved educational and visitor facilities within the castle precincts, but advised against the erection of new buildings there unless there was a need which could not be met in any other way. It sought to minimise visual and physical impact on the setting, and to maximise the adaptive re-use of the basement areas of the western apartments. The current proposals failed to do so. The tea room and educational facilities discussed in the CMP were there intended to be accommodated in the basement areas of the western apartments rather than in new buildings. There was no recommendation in the report for a new building in the south-western area of the Castle Green where the café/shop was now proposed. The CMP did envisage a new visitor centre to the east of the main gate, but of more modest scale and accommodated within an extended embankment.
86. The café/shop was simply in the wrong place. In respect of its proposed siting, the Council relied largely on the historical precedent of structures in this area which they described as "stables". There was no evidence of buildings there before 1871, and they were gone by 1913. They were modest in scale, and could not have accommodated the many carriages and horses that Lord Bute would have owned. Also, in 1872 Burges designed the extensive main stable block subsequently built well outside the Castle Green to the north. The buildings within the Castle Green were more probably workshops for the men employed on
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construction of the castle, and may have included some stabling for horses. They were temporary buildings which were removed when they were redundant, and set no precedent for permanent structures of the type now envisaged.

87. The proposed café/shop would obstruct views of Burges' fine wall and walkway. The wall had been unobstructed by buildings for the last 90+ years and, although a Victorian rebuilding, it remained important evidence for the form of the western bailey as it did not receive an embankment as the eastern bailey did. The wall was also a key element in views of the Clock Tower from inside the main gate (one of the great Romantic views of Western Europe), in views of the medieval Black Tower and main gate from the west, and in the whole composition of the western half of the south wall of the Castle Green. The extensive glazing would lead to light pollution after dark.
88. Looking northwards from the walkway, which gave access to the Burges mansion and where visitors waited for tours to begin, the café/shop building would impinge on the views of the Castle Green, as well as creating noise and cooking smells. There was also the problem of service vehicles in the vicinity. The Council rightly pointed to the present visual intrusion by parked cars and tarmac, but these could be removed in any event, without a new building being erected. The proposal was for the introduction of a large, essentially commercial building in a location where the CMP did not envisage new development.
89. The location of the proposed visitor centre accorded with the CMP. The AMS agreed with the principle of providing facilities in this location, and supported provision of a lift for disabled access, but was concerned about the scale of the proposed building, which was much larger than that envisaged in the CMP. The proposed building was too big and projected too far into the Castle Green. It was accepted that the design attempted to reduce the visual impact, but the brief had resulted in too much accommodation being sought. The AMS was concerned about the visual impact of the cinema drum projecting through the banking. The cinema appeared to be massively over-designed in any case.
90. Given the size of the proposed building, the need to accommodate the military museums had to be questioned. The Royal Regiment of Wales had local connections, although the links with the Castle were not particularly strong. The Queens Dragoon Guards had only been there since 1987 and had no very strong local links. The museums might be desirable features, but the need to reduce the scale of new building might necessitate hard choices. The present brief was fundamentally flawed, and the need was to define the environmental capacity of the site to accept new building, and for the brief to work within that capacity.
91. The present proposals were also a threat to the integrity of an historic landscape which, although subsequently altered, owed much to the C18 work of Capability Brown. It was accepted that the CMP had understated the extent to which C18 landscape features remained. There was little known work by Brown in Wales and little of that survived, so that remaining at Cardiff Castle was of considerable rarity and historic interest.
92. The AMS sought a re-use of the basement areas of the western apartments rather than a new building in the south-western area of the Castle Green, together with a reduced scale of visitor centre provision in the location proposed. A refusal of the present applications would not be the end of the matter, and would allow a re-assessment of the proposals and the formulation of a more appropriate solution that accorded with the CMP.

The Case for Cadw

The material points were: Effect on Archaeology and the Setting of the Monument

93. Cardiff Castle was scheduled as a monument of national importance on 2 May 1949. The stone fortifications, the ramparts, the outer ditch and the interior of the fort, including the motte and stone keep, were all scheduled. The western apartments, the Clock Tower, and the south gateway including the Black Tower were not scheduled, but were Grade I listed buildings.
94. The archaeological deposits dated back as far as the later Roman period, but later landscaping of the Castle Green, particularly the lowering of the general level in the C19, had removed much of the superficial protective deposits, leaving the archaeological deposits close to the surface and hence vulnerable to disturbance. Survival was not uniform, but as much as 2m of stratified archaeological material might survive in the southern part of the Castle Green. The building of the "Roman" wall in the early C20 had damaged the medieval and Roman layers in the banking, but destruction was not total and there were almost certainly traces of earlier banks behind the modern bank. The banked area in the south-western part of the Castle Green had not been affected by the C19 lowering of the general level, and thus represented the only place in the Castle Green where a complete stratigraphy remained. The site thus represented a palimpsest, and an archaeological record of activity over many centuries that was a rare and precious survival.
95. In constructing the visitor centre, the uppermost archaeological deposits surviving within the existing bank would be lost over the construction area. Although it was accepted that raising the foundation level by 250mm had significantly reduced the impact potential of the proposals, the impact was rather more than "negligible" as the applicants termed it. However, although any loss was to be regretted, there were other areas where the same features might survive. Raising the foundation level had also reduced the impact on the area where the visitor centre would extend northwards onto the Castle Green.
96. Cadw accepted the need for improved visitor reception facilities and also that, owing to past disturbance of the bank, it might be possible to achieve such facilities in the area proposed without excessive archaeological damage. The loss of the existing modern structures at the entrance was not to be regretted. There would be public benefit from improved facilities, and the proposed mitigation strategy was largely acceptable. Cadw would not, therefore, have objected to the visitor centre on the grounds of physical impact on archaeological remains. The concern was about the scale of what was proposed and its form, and hence the effect on the setting of the ancient monument. A similar stance was taken by GGAT.
97. The design incorporated much of the accommodation within the profile of the existing bank. However, the bulge at the end of the bank represented a massive curvilinear extension into the Castle Green, and interrupted the regular, rectangular form of the historic defences. The rectangular form of the C3 Roman fort was maintained through the medieval and later periods. The fact that what was visible today was largely an early C20 reconstruction emphasised the continuity of the rectangular form over the centuries. The excessive height of the reconstructed walls, arising from the inclusion of the intra-mural walk, did not detract from this essential rectangularity.
98. The applicants suggested that the curved form would mirror that of the motte, but this was to misunderstand the role of this structure, which was intended to be free-standing and to dominate its surroundings. The large curvilinear form represented by the visitor centre would not accord with the historic pattern, and would make it more difficult for the

visitor to "read" the monument. This would be readily visually apparent from the Castle Green, and particularly from the keep. This, together with the scale of the proposed facility, would have an unacceptable impact on the monument's setting.

99. The café/shop building would be sited in an area where Victorian development (albeit of great architectural importance) had removed most visible evidence of the ancient monument. Hence there was not the same concern about the effect on setting, although the building was large and would be visible from the Castle Green and the keep, and thus have an impact on the general setting. In terms of physical impact on remains, it was unlikely that disturbance would be caused in the area covered by car parking. However, there was concern that the proposed building could result in modest damage to the uppermost archaeological levels in the adjacent grassed area. The extent to which this was acceptable in policy terms depended upon the extent to which it was considered that the need for the proposed facility had been demonstrated. Cadw did not generally provide café facilities in visitor centres (eg Caerphilly), where such facilities were readily available elsewhere, and would not have found the archaeological loss proposed here acceptable had the castle been in their management.

Effect on Registered Park

100. The castle grounds (including the Castle Green) were included in the Cadw/ICOMOS register in Grade I, a category restricted to parks of exceptional interest: there were only 2 other such parks in Cardiff. Because of its history, its rarity, and its state of preservation, it was one of the most important historic parks not only in Wales but in Britain as a whole. It was remarkable in having retained the lines of its Roman enclosure, and adapting it to suit the varying needs of occupants over the next 2000 years.
101. Nothing of the medieval or Tudor gardens remained, and the present appearance of the Castle Green was largely due to Capability Brown. His work in the late C18 made the greatest contribution to its present appearance, transforming the ramshackle collection of old buildings that then existed into sweeping lawns, drives and walkways. He removed the crosswall dividing the two wards, filled in the moat, and cut down the trees on the motte. In the late C19, changes were made to the area's appearance, including a general lowering of the ground level in 1872-3, and the re-excavation of the motte in the 1880's. However, Brown's concept of a park-like open space was retained. The present walls were then built on the Roman lines, but there were few later changes, other than the introduction of car parking and the ticket office. The site could still be "read" for its intrinsic historic interest.
102. The rarity of the site lay in two aspects, the general and the specific. The general rarity lay in the remarkable continuity over a period of 2000 years, with major changes respecting the essentially rectilinear nature of the enclosure. The basic format of straight walls with, from the medieval period, interior banks, survived. The specific rarity lay in the Castle Green being an example of the work of Brown that was untypical in two ways. First, it was unusual in being in Wales, when most of his 200 or so commissions were in England. Only two commissions were known in Wales, Cardiff Castle and Wynnstay (Wrexham), both now registered Grade I. Secondly, Brown was associated with sweeping parkland landscapes, and a confined, small scale example, as at Cardiff, was very rare.
103. The cultural value of the castle was widely recognised, and nothing should be permitted that would lessen that value. The Council's own planning policies presumed against any such damage, for example in Policies 03 and 04 of the Local Plan. It was the view of Cadw that the present proposals would lessen the value of Cardiff Castle, and contravene the Council's

own policies.

104. The application proposals would produce two substantial new buildings unrelated to the historic value of the landscape setting. Of the two, the visitor centre would be the more damaging, for two reasons. Firstly, its scale would be a dominating feature on the south side of the Castle Green, visible from most points. Secondly, the form of the building would protrude into the Castle Green in a way that would damage the rectilinearity of the enclosure and interrupt the openness created by Capability Brown. The applicants referred to the curvilinear forms within the Castle Green in support of their proposals, but the setting was an amalgam-not a fusion-of curvilinear and rectilinear forms, and the proposals would not reflect this distinction. The café/shop would be less damaging visually in landscape terms, but would require the partial destruction of the historic shrubbery bank that was the only remnant of the C18 ground level, which was unacceptable. The overall effect of the proposals would be to blur the historic character of the landscape and, by adding additional features of no historic value, significantly alter its character.

Effect on Listed Buildings

105. Cardiff Castle was a Grade I listed building within a Conservation Area, and was considered by the Historic Buildings Council for Wales to be a building of outstanding architectural or historic interest. Over recent decades interest in, and understanding of, Victorian architecture had grown and research, including that by the present curator, had led to an enhanced value being placed on Burges' work. Earlier work was also of importance and the updated 1999 listing description referred to it as " an exceptional building with outstanding architectural features from many historical periods". This was an important building not just in Wales, but also in the British and even the European context. The statutory and aesthetic constraints imposed by these considerations were significant. It was impossible to alter the fabric of centuries of history without interfering with the layers of accretion, each having its own importance and each making a contribution to the unique whole. The rectangular Roman layout, retained over subsequent centuries of development, deserved the utmost respect.
106. The CMP proposal for the visitor centre continued the line of the banking, removing smaller modern structures of no merit. The scope for inserting new development here was obviously constrained and there was little scope for prominent modern architectural expression in this historic setting, and the CMP proposals suggested the outline of a more acceptable solution than that now proposed. These proposals were located in an historically and functionally unresolved area between the 1920's excavations and the 1925 Barbican Tower. This was also a functionally satisfactory location, where a fairly large, partly underground structure was possible. The CMP did not propose a second new building to accommodate the café/shop.
107. The conservation and development aspects of the CMP were supported by Cadw. The plan was not subsequently reviewed with the involvement of Cadw or any other agency outside the Council, and Cadw was not informed of the extent of change proposed until a presentation in October 2001. Cadw then wrote to the Council, giving its support for enhanced visitor facilities, but questioning the significant scale of the proposals, and suggesting a reduction in scale. Subsequent discussion showed that the Council regarded the extent of accommodation specified in the brief as not negotiable, whereas Cadw considered that the starting point had to be the amount of space that the setting could accept without damage, and that the brief should be devised within that limit. With that difference of basic approach, negotiations to reach an acceptable compromise were not seen as feasible. The

Council's references to the new Caerphilly visitor centre built by Cadw did not compare like with like. The building was minimal, consisting of a ticket office and shop. There were no public toilets or café, and interpretation was in existing historic buildings.

108. The present proposals for the visitor centre involved not only substantial extension of the embankment into the level parkland but also the superimposition of a curved or faceted vertically walled structure growing out of the bank. These features would be larger and more prominent than the historic setting could tolerate without adverse effect on wider views within the Castle Grounds and on the adjacent historic buildings. The site proposed for the café/shop was surrounded by medieval and Victorian buildings of outstanding architectural quality. In particular, the Clock Tower was one of the C19's greatest architectural achievements. A major new building at its base was an unacceptable intrusion into its setting. The proposed designs represented a sophisticated and skilful attempt to fit too much accommodation into a sensitive and historic location, but the fault lay with an over-ambitious brief that required too much new building.

Written Representations

109. Letters of representation will be found at Document 3. Letters of objection were received from the Glamorgan Gwent Archaeological Trust, SPAB, and the Victorian Society. Their concerns were about the effect on the setting of historic buildings and landscape, and are similar to those covered in the statements of case above by AMS and Cadw. Letters of support were received from Disability Wales (about disabled access), Cardiff 2008, St David's Partnership, Cardiff Chamber of Commerce, Queens Arcade Shopping Centre, Cardiff Initiative Ltd, Capital Region Tourism, and Cardiff Hoteliers. These dealt with the tourism and commercial benefits that would result from the application proposals. Letters about the position of the military museums were received from the 1st Queens Dragoon Guards, the Royal Regiment of Wales, the Defence Estates, and the Council for Museums in Wales. The Countryside Council for Wales confirmed that it had no observations to make on the proposals.

INSPECTORS CONCLUSIONS

Conclusions

110. Bearing in mind the above, and as a result of my inspection of the site, I have reached the conclusions set out below (numbers in brackets refer to paragraph numbers in the body of the report). I begin by considering the status of plans and documents, before turning to the other matters identified by the National Assembly, and then moving on to the planning balance.
111. In respect of national policy as set out in Planning Policy Wales and the circulars, I shall deal with these when I come to the relevant considerations. As far as local policy is concerned, I need only note at this stage that the development plan for the purposes of Section 54A consists of the South Glamorgan (Cardiff Area) Replacement Structure Plan 1991-2001 and the City of Cardiff Local Plan. Both have the usual policies dealing with conservation issues, in addition to tourism and recreation policies, to which reference has been made above. The emerging UDP is at such an early stage that it can be given little if any weight in the present case. The City Centre Strategy 1998-2002 and the design guide are relevant supplementary planning guidance, but in the present case they add little to the relevant development plan policies (12, 13, 14, 64, 65).
112. A document much quoted at the inquiry was the Conservation and Management Plan (CMP) prepared in 2000 as the basis for Heritage Lottery funding (14, 82). The objectors rely on this document as a yardstick against which to assess the present proposals. The Council, in contrast, regard it as being (at least in part) a statement of work in progress, to some extent overtaken by events. In particular, they regard the somewhat diagrammatic visitor centre proposals in the CMP as having been overtaken by the work undertaken to define the brief for the present, detailed, proposals. These proposals, the Council says, build on, but take forward, the provisions of the CMP (24, 32). The objectors' response is that the provisions of the CMP were materially changed soon after it was prepared, without any systematic review being undertaken, and without any proper consultation with interested parties (83, 107).
113. The CMP is not a planning document, and does not have the status of supplementary planning guidance. I agree with the Council that it is not to be used in the determination of these applications as though it were part of the development plan (24). In particular, it would not be correct to assess the present visitor centre proposals by comparing them with the sketch scheme in the CMP. Compliance with the CMP is not the issue here. However, the CMP does have some relevance in the present case, particularly where its provisions clearly accord with national planning guidance. Further, it is central to the Council's case that a balance needs to be struck between conservation considerations and wider considerations, including the need for the development (58, 59, 60, 63, 78). Comparing the application proposals with the relevant parts of CMP is one way in which the development of the brief, and hence the assessment of need, may be measured.
114. One further general point needs to be made at this stage. The Council referred to the wider background to the present application proposals, for example the increase in projected visitor numbers, the proposed relocation of major events from the Castle Green to Bute Park, and the opening of the North Gate to allow non-paying access to Castle Green (24, 29). These are management issues outside the scope of the present applications, and are matters for the Council, although some, for example the increase in visitor numbers, are clearly of concern to the Ancient Monument Society (84). There are also various development works in process or proposed outside the scope of these applications on which

it would be inappropriate for me to comment (16). I shall deal only with the four applications, two for planning permission, two for scheduled monument consent, and I shall begin by considering the impact on the scheduled archaeological remains.

The First Consideration: Effect on Archaeological Deposits

115. National policy in respect of planning and archaeology is set out in Planning Policy Wales (2002) and in Circular 60/96 (11). The protection of archaeological remains, which are a finite and non-renewable resource, is one of the four conservation objectives in respect of the historic environment set out in PPW (paragraph 6.1.1). The desirability of preserving an ancient monument (whether scheduled or not) and its setting is, quite apart from the procedure of scheduled monument consent, a material consideration in the determination of a planning application. As regards scheduled monuments, the main purpose of scheduling is to ensure preservation, and hence there is a policy presumption in favour of their preservation, ie a presumption against proposals that would cause significant alteration or damage, or have a significant impact on the setting of visible remains (paragraph 6.5.1 of PPW and paragraph 11 of Annex 1 of C60/96). This presumption is reflected in the phrasing of the relevant matter on which the National Assembly wished to be informed: whether there are grounds for setting aside the presumption against the works.
116. There can be no doubt that the Castle Green potentially contains archaeological deposits of unusual interest, from the late Roman period onwards. This potential has been recognised by the applicants from an early stage, expert advice has been taken, and changes have been made to the proposals, including the reduction in size of the café/shop and the raising of foundation levels by 250mm. There is no doubt that these measures have materially reduced the likely extent of physical destruction, and the Glamorgan Gwent Archaeological Trust no longer objects on grounds of physical destruction, although they maintain an objection on the grounds of effect on setting (43, 44, 45, 46, 79, 80, 94, 95).
117. The view of Cadw is that the physical destruction caused by the visitor centre can be accepted, but not its effect on the visible setting (96). As regards the café/shop, there is less concern about its effect on the visual setting of the monument (as opposed to the listed building aspects), but the degree of physical destruction that would result, which Cadw described as "modest", would only be acceptable if the need for the proposed facility was established, something that Cadw would not accept if the site were in their care (99).
118. I shall deal here only with the question of the physical impact of the proposals on the archaeological remains. The question about the visual impact on setting is best considered separately alongside the matter of visual effect on the setting of listed buildings, since many of the same matters need to be addressed in both cases.
119. Turning first to the proposed visitor centre, I note that the principle of building in this area is not questioned, that the existing buildings that would be removed are modern structures of no merit, and that the archaeology of the grassed bank area has been greatly disturbed by past works, although destruction will not have been total (35, 75, 89, 94, 96). I consider that the destruction that would result from constructing the visitor centre is rather more than "negligible", as the applicants term it (95), and I think that the extent of destruction might well be a little more than they indicate because of the need to have working space around the footprint of the proposed building. However, extensive areas of banking would remain for future excavators to examine (45, 95), and the need for enhanced visitor facilities for the castle is undoubted (35, 81, 96). In the circumstances, I would not raise an objection to the visitor centre on the grounds of physical destruction of archaeological remains, subject to

the implementation of an agreed mitigation strategy.

120. As regards the café/shop, it appears unlikely that the area covered by car parking would be unacceptably disturbed by the proposed works (46, 99). The raised banked area represents the last surviving example of the general ground level of the Castle Green before the late C19 lowering, and hence could provide a complete stratigraphy not otherwise available (46,48, 51, 94). Cadw takes the view that the degree of loss here would be "modest" (99) although, again, I am unsure that the destruction that would result from the needs of working space, and services connections, has been fully taken into account. Even that extent of loss would, in my view, only be acceptable here if the need for the building were pressing. For reasons given later, I do not consider that the case for the café/shop is convincing, and hence I would sustain an objection to it because of the loss of an area, admittedly small, that is stratigraphically unique within the Castle Green.

The Second Consideration: Effect on Setting of Listed Buildings

121. National policy in respect of listed buildings is set out in Planning Policy Wales (2002) and Circular 61/96 (1996), the relevant legislation being in the Planning (Listed Buildings and Conservation Areas) Act 1990. Although, for the purposes of the inquiry, scheduled monument status was considered to take precedence over listing, policy considerations relating to listed buildings are still relevant to the planning applications, although there are no listed building consent applications (3). Section 66(1) of the 1990 Act requires that, in considering whether to grant planning permission for development which affects a listed building or its setting, the decision-maker shall have "special regard" to the desirability of preserving the building or its setting, or any features of special architectural or historic interest which it possesses.
122. The grading of a listed building is clearly a material consideration, and a Grade I listing identifies a building of exceptional architectural or historic interest (paragraph 71 of Circular 61/96). All parties to the inquiry were agreed on the outstanding architectural and historic interest and value of the castle (23, 74, 81, 105). There is no significant physical work proposed to the historic fabric (40). The consideration in the present case must therefore be the effect on the setting of this exceptional building and (since the proposed works would not be visible from without) that means the effect on the views from within the Castle Green.
123. I shall deal first with the proposed visitor centre. As noted above (paragraph 119), the principle of having such a facility in the area immediately to the east of the main gate is not disputed, and the replacement of the small modern structures in this area offers an opportunity for visual and functional enhancement. It is also relevant that planning permission (never implemented) was granted for a visitor centre in this location in 1997 (15, 75), and that the CMP located a visitor centre in this area (35, 85). It is not the location of the proposed visitor centre that has caused concern, but rather its scale and form (85, 89, 90, 98,107, 108). I share those concerns, whilst recognising that the design represents a considered and skilful attempt to minimise the visual intrusion caused by introducing such a large building into this sensitive location.
124. The size of the proposed structure considerably exceeds the 1997 proposal or that in the CMP, and is a reflection of the requirements of the brief (15, 33, 85). The approach taken has been to establish the accommodation desired to serve the visitor numbers envisaged; to design that accommodation (in two buildings) in such a way as to seek to minimise its visual impact as far as that is possible; and then to consider whether the impact of the

resulting proposals is acceptable, with the Council concluding that it is (29, 33, 66). Policy 7.913 of the CMP seeks to maximise the adaptive re-use of the basement areas of the western apartments and to avoid new building where possible. I believe this to be an appropriate policy for an historic building of this importance. However, since it is agreed that some new building in the proposed location of the visitor centre is necessary, even desirable, an alternative design approach to that taken would start with the degree of change that such a sensitive setting could tolerate; it would assess the maximum extent of new building that could be acceptably accommodated in the location proposed for the visitor centre, and then work within the constraints thus imposed. Any functions that could not be accommodated within the new building as thus defined would have to be located within the existing buildings. If this were not possible, hard choices would have to be made as to which functional requirements could not be satisfied.

125. It would hardly matter which approach were taken if the extent of accommodation proposed resulted in a building which was of an extent and impact appropriate to its setting. In my view, that is not the case here. The proposed visitor centre is too large a feature to be acceptably introduced into this historic setting, and considerably exceeds the building envelope that would be likely to be defined as the maximum extent of change that the setting could tolerate under the alternative approach outlined above. This is, of course, a matter of aesthetic judgement, but I note that the views of Cadw and the amenity societies are similar to mine on this point (89, 108, 109).
126. The decision to bury the building in an extended grass bank does something to mitigate its sheer bulk, but the northward extension into the Castle Green itself is at odds with the historic pattern of development. The enclosing walls are essentially rectangular in form and, whilst there are curved features within the walls, notably the motte, the distinction between the hard rectangular enclosure itself and the softer curved forms it contains is the result of historic evolution, and would be compromised by the form of the proposed visitor centre (68, 72, 97, 98). As well as its impact on the setting of listed structures, the form of the building would blur the historic development of the scheduled monument, making it more difficult to "read", and thus adversely affecting its setting. I accept the Council's point that there has been change over time, and that the "Roman" walls are Victorian and later features, historically inaccurate in being too high (9, 72). However the changes, including walls built as late as the 1920's, maintained the essentially rectangular form of the enclosure (72, 97), and it is this from which the form of the proposed visitor centre would depart.
127. The proposed café/shop building would represent much more of an intrusion into the setting of the listed buildings than the visitor centre, being a relatively large, modern, free-standing building introduced into the area of the Castle Green itself, where no building has stood for nearly a century (37, 86). The CMP did not envisage a building in this location, and (paragraph 6.3.5) saw the present tea room in the western apartments as being retained, with modifications (85). That tea room is undoubtedly unsatisfactory as presently constituted, but a new structure would conflict with the intention of Policy 7.9B of the CMP that new buildings should only be permitted where re-use of the basement areas in the western apartments was not possible. It has not been adequately demonstrated that such adaptive reuse is not feasible in this case.
128. The whole concept of introducing a large new building into the Castle Green, within a scheduled monument and also within the immediate setting of a Grade I listed building (3), is one that would, in my view, need much more justification than has been provided. The building would obscure views of Burges' south wall and walkway from the Castle Green, and would diminish the setting of his Clock Tower, one of the glories of late Victorian

architecture (108). Looking from the walkway it would intrude into views outwards over the Castle Green. There is not just the impact of the building itself to be considered, but also that of service vehicles, refuse stores, and the other impedimenta that always accompany catering buildings.

129. One of the Council's main arguments in favour of siting a building here is that this was the site of a stables block between about 1871 and 1913. Objectors argue that the building(s) which undoubtedly stood here were workshops connected with the building of the castle, which may have included some stabling (37, 86). On the balance of probability, I think that the latter is more likely, since the buildings were clearly much more modest in scale than the stables eventually built to the north (10, 86), and apparently continued in use after those buildings were constructed. In any case, I do not attach very much importance to the fact that some structures of a utilitarian nature stood here over 90 years ago, and I do not consider that it provides much justification for introducing a large building into the immediate setting of a Grade I listed building. I am much more concerned about the visual intrusion such a building would cause, and the lack of adequate justification for it. Nor do I consider the removal of car parking a convincing argument (54(1), 73), since it could be done without the erection of a substantial new building.
130. In summary, then, I find the proposed visitor centre location to be acceptable, but the present proposals to be detrimental to the setting of the listed building and the scheduled monument by virtue of form and scale. As regards the café/shop, I find the need for a large new building in this location to be unproven when the intention of the CMP was to use the basement of the western apartments. A building in this location would detract from the setting of the listed building, particularly the Clock Tower. The proposed landscaping scheme, whilst acceptable in itself and helping to mitigate impact, does not overcome these concerns.

The Third Consideration: Effect on Conservation Area

131. The Castle is situated within the Cathays Park Conservation Area (4), and hence Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 applies. This requires that special attention shall be paid in decision-making to the desirability of preserving or enhancing the character or appearance of the area. The matter can be taken quite shortly. The proposed works are entirely enclosed within the outer walls of the Castle, and even the tallest feature, the lift tower, would not be visible from outside (53, 76). Hence, the appearance of the Conservation Area may be said to be preserved. The proposed works would not change the character of the Castle's use, and hence would have no effect on the character of the area.

The Fourth Consideration: Effect on the Registered Park

132. The Castle grounds (Castle Green and Bute Park) are registered Grade I on the register of landscapes, parks and gardens (4, 100). Whilst non-statutory, this fact is clearly a material consideration in the present case (paragraph 6.5.23 of PPW). The assessment of the impact on landscape depends to a large extent on the degree to which the present appearance of the Castle Green derives from the work of Capability Brown. Informed opinion differed here. The CMP regarded Brown's work as having been eliminated by later changes, although the parties to the inquiry all disputed that assessment. The Council took the view that many of the characteristics of Brown's landscape remained, even if subsequently eroded or compromised. The AMS and Cadw considered that the present appearance owed much to Brown's work, giving it rarity value in the Welsh context and in the wider context of his

work generally (48, 49, 91, 101, 102).

133. What is not contentious is that the open, parkland aspect of the Castle Green was established for the first time by Brown's work in the late C18, and I consider that the essential character that he established then can still be discerned beneath later changes. As stated above, the visitor centre would not reflect the long-standing relationship between the essential regularity of the external walls, even when reconstructed, and the more open, less regulated character of the Castle Green. Its curved form, and the relatively large northward intrusion into the Castle Green, would fail to reflect this historic character, and would lessen the intrinsic interest of the registered park. As regards the café/shop, I find the introduction of a large modern building into the registered parkland less acceptable than do Cadw (104). The fact that shielding is possible by replanting of the adjacent banked area is noted (51, 54(4), 54(6)), but that would not disguise the fact that a new building for an essentially commercial function had been introduced into the park. The presence of some structures in this area c1871 to c1913 has been dealt with above (paragraph 129), and cannot be regarded as giving any sanction for the present proposal. I conclude that the application proposals would detract from the appearance and the historic character of the registered parkland.

The Four Considerations: Summary

134. The four matters considered above are all essentially conservation issues, and they derive from the matters on which the National Assembly wished to be informed, with the addition of the effect on the Conservation Area, which follows from the provisions of Section 72(1) of the 1990 Act cited above. I found the application proposals to be satisfactory from the point of effect on the Conservation Area, and the effect on the listed fabric itself. The least satisfactory aspect is, I believe, the impact on the setting of Grade I listed buildings of exceptional architectural and historic interest resulting from the introduction into the Castle Green of two large new buildings, the café/shop being the more unacceptable of the two. There are also lesser, but real, issues about the impact on the historic landscape, and on the monument's setting. In terms of impact on buried remains, I consider that, subject to mitigation, the effect of the visitor centre is acceptable, but that of the café/shop is, whilst not in itself extensive in terms of remains lost, unacceptable where the need for the building has not been proved.
135. I conclude, therefore, that there are conservation-based objections of real substance to the present proposals. However, these have to be weighed against other considerations, notably the need for the proposed development in the light of national and local tourism and recreation policies, in order to strike an appropriate balance. It is to the matter of that planning balance that I now turn.

The Planning Balance

136. The Council argued, correctly, that the conservation considerations had to be balanced against issues of tourism, economic development and social inclusion, the latter including both the attraction of groups currently under-represented in cultural tourism, as well as the provision of disabled access (56, 57, 58, 60, 61, 78). It is this balance which I now address. PPW stresses the National Assembly's commitment to economic development (in Chapter 7) whilst ensuring that such development is in line with sustainability principles, and respects the environment in terms of location, scale and design (paragraph 7.1.5, fifth bullet point). Tourism is recognised in PPW as a major element in the Welsh economy (paragraph 11.1.1), and there is a Technical Advice Note (TAN13) devoted to the subject. It is an objective of the Assembly to encourage sustainable tourism, maximising its economic and

employment benefits whilst protecting the environment (PPW, paragraph 11.1.2).

137. PPW refers at several points to the Assembly's commitment to sustainable development (paragraph 1.4.4, for example, refers to the Assembly's specific duties in this respect). The four objectives to be met in working towards sustainable development are set out in paragraph 2.1.4: the first of them is social progress which recognises the need of everyone. The following paragraph lists principles, the first of which is putting people at the centre of decision-making. Paragraph 2.3.2 states that planning policies and proposals should (inter alia) foster social inclusion by securing a more accessible environment for everyone. These references (and many others could be quoted) show that issues of tourism, economic development and social inclusion are to be given due weight in decision-making, within the overall concept of sustainable development.
138. The importance of Cardiff in terms of tourism in Wales, and the importance of tourism to the city's economy, are both undisputed (27). The development plan policies in respect of such issues as tourism, recreational development, equality of access and provision for special needs groups have been noted above, and must be given proper weight in decision-making (12, 64).
139. The Council contended that the potential of the Castle as both a tourism venue and a community asset was not being fully realised, that it was under-performing in visitor numbers when compared with similar properties elsewhere, and that a significant increase in visitor numbers was achievable with the right strategic approach (27, 29). Insofar as these are management issues, I do not need to comment specifically here, although I should note for the record that the CMP (Management Plan, Document 2, page 8) refers to the castle's excellent performance against a background of deteriorating visitor numbers to historic attractions in Wales. It advises consolidation, and avoidance of the temptation to increase visitor numbers still further. It recommends that a sustainable level of tourism activity should be sought.
140. Having established the numbers that were to be accommodated, the brief was then prepared setting out the accommodation sought (29, 32, 33, 34). It is the extent of that brief that has led to the present proposal for two new buildings. I have no evidence to suggest that Policy 7.913 of the CMP was followed, with its recommendation that there should be maximum adaptive re-use of the basement areas in the western apartments, with the avoidance of new buildings where possible. This policy appears to me to be apposite in a situation where the extent of new building proposed is harmful to the conservation aspects that I have considered above. The Council drew attention, correctly, to the fact that the castle lacks those outbuildings that are often used for visitor facilities at other historic sites (26), but no explanation was given for not seeking greater use of the lower levels in the western apartments.
141. It has not been demonstrated, therefore, that an attempt has been made to minimise the extent of new building. It has always been accepted that some new construction will be needed adjacent to the main gate, and that is not questioned (15, 35, 89, 107). It is the extent of that building which is at issue, together with the second building for the café/shop, a function that the CMP recommended should be located in the existing buildings. Hence, it has to be questioned whether, if greater use had been made of existing accommodation, the benefits that would follow from the enhanced visitor facilities could not have been secured with less new building, and hence less impact on the historic setting.
142. The Council argued that the brief stemmed from an analysis of visitor demand, and that it

would be absurd to build something inadequate to meet that demand (41). This suggests a degree of objectivity about the brief that is misleading. The numbers to be accommodated resulted from the decision of the Council to seek increased visitor numbers (29). The accommodation to be provided does not flow automatically from the decision about numbers but, again, results from decisions consciously taken as to what was to be provided. It was decided, for example, to provide a café of the size proposed, and to accommodate it in a new building. Similarly, it was decided that the two military museums should be retained on the site, although Issue 16 of CMP (Conservation Plan, Document 1, page 45) had noted that the QDG museum, only there since 1987, was unrelated to the castle's history (31, 33, 34).

143. A distinction was drawn above between a demand-led and an environment-led approach to the formulation of the brief and the design of facilities to meet that brief (paragraph 125), a distinction that the Council rejected (41). If there were no concerns about the impact of the application proposals on the historic environment in which they would be situated, then such a distinction would indeed be irrelevant. Since I have identified harm to the historic environment, I consider such a distinction to be very relevant to the present applications. Whilst I can accept that the present facilities for visitors, including interpretation facilities, are inadequate even for present visitor numbers (25), and I also accept that the present proposals would deliver real benefits in terms of tourism, economic development and social inclusion, I have to conclude that it has not been shown that those benefits could not be delivered by more modest proposals, involving less new building, that would have less environmental impact on this exceptional historic setting. The same case applies to the generation of extra income as a result of new facilities.
144. My conclusion, therefore, is that the present proposals would cause material harm to the historic environment in which they would be situated; that more environmentally acceptable alternative proposals may be capable of formulation that would deliver similar social and economic benefits; and that the need for the development does not therefore outweigh the conservation issues identified in national and local planning policy that indicate that planning permission and scheduled monument consent should not be granted. I must, therefore, recommend refusal of these applications.

Conditions

145. In case the National Assembly is minded to grant planning permission and scheduled monument consent for these applications, I should deal with the conditions, a matter discussed at the inquiry.
146. Suggested conditions in respect of the planning applications are at Document G4. There are separate lists for the two applications. In respect of application 02/0823C, it was agreed at the inquiry that conditions 5 (matters covered in condition 32), 10 (cycle parking), 12 (management plan), 13 (bollards), 25 (floodlighting), 26 (advertisements), 28 (hoardings), and 29 (machinery) were unnecessary in the circumstances of the case. The other conditions are appropriate, although (for the avoidance of doubt) condition 2 could usefully list the numbers of the approved drawings; and condition 16 should (because of the impact on archaeological remains) refer to "drainage and other underground services".
147. In respect of application 02/0824C, conditions 12 (cycle parking), 14 (management plan), 15 (bollards), 27 (floodlighting), 28 (advertisements), 30 (hoardings) and 31 (machinery) are unnecessary in the circumstances of the case. Similar comments apply to conditions 2 and 18 here as to conditions 2 and 16 above.

148. Cadw has drafted conditions in respect of the scheduled monument consent applications (same in both cases) and these are at Document G5. The only comment is that, for the sake of clarity, it should be made clear that condition 7 applies only to modifications affecting the archaeological deposit.

Recommendation

149. For the reasons given above, I recommend that these applications for planning permission and scheduled monument consent should be refused.

Peter Macdonald
Inspector

APPEARANCES AND DOCUMENTS

APPEARANCES

For the Council

Mr Graham Walters, of Counsel: instructed by the Council's Head of Legal Services

He called:

Mr John Edwards, MCIQB, MRICS, IHBC: Surveyor to the Fabric, Cardiff Castle

Dr Terry Stevens, BA, MSc, PhD, FTS, MILAM, FALA: Director, Stevens and Associates

Mr Simon Warder, MA, BSc, MRTPL Director, RPS Planning, Transport and Environment

Ms Laurie Stewart, MDes MSCD FAHI: Director, Furneaux Stewart Design and Communication

Mr Matthew Williams, BA, DipAGMS, AMA: Curator and Keeper of Collections, Cardiff Castle

Mr Niall Phillips, BA, DipArch, RIBA: Director, Niall Phillips Architects

Mr Simon Bonvoisin, BA, MSc, MiCFor, MIEnvSc: Director, Nicholas Pearson Associates

Mr Kevin Blockley, MPhil, MIFA: Director, Cambrian Archaeological Projects

Mr Nigel Hanson, BSc, DipTP, MRTPI: Group Leader, Development Control Team, CCC

For the Ancient Monument Society

Mr Frank Kelsall

He called:

Mr Giles Quarme, BA, DipArch, DipCons(AA), RIBA, FRSA: Chairman, AMS

(as an executive committee member of the Georgian Group, Mr Quarme also presented their views in respect of the C18 landscape)

For Cadw

Dr Michael Yates, BA, PhD, FSA; Inspector of Ancient Monuments

Mrs Elisabeth Whittle, MA, FSA: Inspector of Historic Parks and Gardens

Mr Douglas Hogg, RIBA, ARIAS, FSA Scot, Chief Conservation Architect

DOCUMENTS

General Documents

- G 1: Lists of persons present at the inquiry
- G2: Letter of notification and list of persons notified
- G3: Written representations received
- G4: Planning conditions discussed at inquiry
- G5: Scheduled monument conditions discussed at inquiry

Core Documents

- CD I to CD 16: see **attached list**

Council's Documents

- C1: Appendices to Mr Hansons's proof; appendices 1 to 51 inclusive, arranged in bundles A to I, each bundle listed separately. Referenced by bundle and appendix number, eg C1/A/6 for N Phillips planning design statement. Note that the planning conditions at C1/1/51 are as suggested by Council prior to inquiry, and are modified by the comments in paragraphs 145 and 146 of this report
- C2: Appendices to Mr Warder's proof; listed separately as SW1 to SW14. See attached list. Referenced as, for example, C2/SW12 for St Davids Phase 2 illustrative proposals
- C3: Stratascan drawings of geophysical survey
- C4: Photographs of mound, moat and North Gate
- C5: Photographs of model of proposed scheme
- C6: Cultural Tourism Strategy for Wales, WTB, 2003
- C7: Cardiff Visitor Study, CRC, 2000
- C8: A Tourism Strategy for Wales, WTB, 2000
- C9: Cardiff Strategic Tourism Growth Area Action Plan, L and R Consulting, 2002
- C10: Documents submitted by Cardiff County Council on 3 December 2002, following call-in, in respect of application 02/0823C
- C11: Ditto in respect of application 02/0824C (bundles 5 to 8 are common in respect of both applications)
- C12: Photographic analysis of impact of proposed lift roof
- C13: Details (including plans) of current schemes of work in progress at Cardiff Castle
- C14: Furneaux Stewart: Interpretation through Education

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- C15:Furneaux Stewart: Design Development, Cardiff Castle Interpretation Centre
- C16:Appendices to Mr Phillips' proof: Appl;Space and functional brief; App2;site options appraisal location plan
- C17:Appendices to Dr Stevens' proof: Appl; design day analysis; App2; photos of other visitor centres
- C18:Scheme description, extract from Mr Phillips' proof
- C19:Alternative locations considered, extract from Mr Phillips' proof
- C20:Planning history

Cadw Documents

W1: Appendices to Dr Yates proof:

App 1: What is Cadw?

App2: Scheduling details of Cardiff Castle

App3: Listing description of Cardiff Castle

App4: RCAHM inventory: Roman Remains (extract)

App5: RCAHM inventory: Medieval Castles (extract)

App6: Letter to Cadw from Dr Webster, Cardiff University, 23 July 2002

App7: Planning Policy Wales (extract)

App8: Circular 61/96 Planning and the Historic Environment : Archaeology

W2: Appendices to Mrs Whittle's proof:

App 1: Register description of Castle Green and Bute Park

App2: Plan of Cathays Park Conservation Area

W3: Appendices to Mr Hoggs Proof: letters from C to Cardiff CC, 2 and 6 November 2001

AMS Documents

A1: Appendices to Mr Quarme's proof; 4no, listed separately in document

A2: Photographs: 13 sheets, listed separately in document

CORE DOCUMENTS

1. Cardiff Castle Conservation and Management Plan, Ferguson Mann Architects
2. The Castle Green: Trees in the Landscape, Cardiff County Council. February 2003;
3. Cardiff Castle - Strategic Vision and Operational Visitor Management Plan
4. An Independent Review of the Current Plans and Proposals for Cardiff Castle, Stevens & Associates, January 2002;
5. Geophysical Survey Report, Stratascan, April 2002:
6. Conserving Cardiff Castle - The 15 Year Plan, Cardiff County Council,
7. The Castle Green: A Development History, Cardiff County Council, March 2002;
8. Archaeological Desk Based Assessment, Cambrian Archaeological Projects Ltd, March 2002;
9. Geotechnical Report, Earth Science Partnership, March 2002;
10. Design Statement, Niall Phillips Architects Ltd;
11. New Visitor Building Appraisals, Niall Phillips Architects Ltd;
12. Proposed Café/Retail Building, Method Statement for Excavation, Cambrian Archaeological Projects Ltd, 2nd Revision November 2002;
13. Proposed Visitor Reception Building, Method Statement for Excavation; Cambrian Archaeological Projects, 2nd Revision November 2002;
14. Castle Green Historical Development (plan)
15. Furneaux Stewart Interpretative Plan
16. Photomontages

DOCUMENT CI : APPENDICES TO MR HANSON'S PROOF OF EVIDENCE

BUNDLE A - BACKGROUND INFORMATION AND DESIGN STATEMENTS

1. Designation of Cardiff Castle and Roman Fort- Scheduled Ancient Monument, Listed Building Grade 1 and Historic Garden
2. Cathays Park Conservation Boundary
3. Cardiff County Council, Local Plan Proposals Map
4. Plan showing current site features
5. Landscape Plan- post Capability Brown
6. Planning Design Statement. Niall Phillips
7. Building Appraisals. Niall Phillips
8. Environmental Assessment Screening Opinion letter

BUNDLE B - PLANNING HISTORY AND PHOTOGRAPHS

9. Details of applications 92/0772C and 92/0773C
10. Details of application 97/0019C
11. Details of application 01/0196C
12. Observations and Report to Committee on Scheduled Monument application 02/1619C
13. Observations and Report to Committee on Scheduled Monument application 02/16200
14. Details of application 03/0365C
15. Decision notices applications 03/0366C, 03/0367C and 03/0404C
16. Photographs of the Victorian Stable Block to the southwest corner and 1920s construction of south embankment and south lodge (Extracts from Core Document 'Archaeological Desk Based Assessment')

DOCUMENT C1: APPENDICES TO MR HANSON'S PROOF OF EVIDENCE

BUNDLE C - PLANNING POLICY

17. Extracts from Planning Policy Wales 2000
18. Extracts from TAN 12: Design
19. Extracts from TAN 13: Tourism
20. Extracts from Circular 60/96 Planning and the Historic Environment: Archaeology
21. Extracts from Circular 61/96 Planning and the Historic Environment: Historic Buildings and Conservation Areas
22. Relevant policy extracts from South Glamorgan (Cardiff Area) Replacement Structure Plan 1991-2011
23. Relevant policy extracts from City of Cardiff Local Plan. January 1996
24. Extracts from the City Centre Strategy 1998-2002 and Draft City Centre Strategy 2002-2006
25. Extract from the City Centre Design Guide. September 1994

BUNDLE D - ASSESSMENT OF PLANNING APPLICATIONS

26. Report to Planning Committee 02/0823C including late representations
27. Report to Planning Committee 02/0824C including late representations
28. Planning Committee minutes, 26.02.03
29. Letters from Access Committee for Wales (Disability Wales), RNIB Cymru (JMU Partnership) and extract from Cadw, Overcoming the Barriers
30. Consultation responses from Dwr Cymru

BUNDLE E - CONSULTATION RESPONSES FROM AMENITY BODIES

31. Consultation response from The Royal Commission on the Ancient and Historical Monuments of Wales
32. Consultation response from the Council for British Archaeology

DOCUMENT CI: APPENDICES TO MR HANSON'S PROOF OF EVIDENCE

33. Observations of the Central Area Conservation Group and the Council's Strategic Planning (Conservation and Design) Service
34. Consultation responses from The Garden History Society and The Georgian Group
35. Consultation responses from Cadw
36. Consultation responses from The Victorian Society
37. Consultation response from the Society for the Protection of Ancient Buildings
38. Consultation responses from The Ancient Monuments Society
39. Consultation responses from Glamorgan Gwent Archaeological Trust

BUNDLE F - MISCELLANEOUS

40. Letter from the Planning Inspectorate 10.12.2002
41. Photographs of the site as at 01.05.03 and aerial photographs from core document 'The Castle Green: Trees in the Landscape'
42. Letter from Applicant dated 25.02.03
43. Letter of support for the military museums
44. Design for Interpretation Centre from the Conservation and Management Plan

BUNDLE G - ARCHAEOLOGICAL INFORMATION

45. Extract Archaeological plans from "Archaeological Desk Based Assessment"
46. Letter from Dr Peter Webster 23.07.2002
47. Amended Archaeological plans from "Method Statement for Excavation" Report 229A
48. Amended Archaeological plans from "Method Statement for Excavation" Report 2298

DOCUMENT CI: APPENDICES TO MR HANSON'S PROOF OF EVIDENCE

BUNDLE H - LETTERS OF SUPPORT

49. Letters of support from St David's Partnership, Queens Arcade Shopping Centre, Wales Tourist Board, Cardiff 2008, Cardff Hoteliers, Urdd Gobaith Cymru, Capital Regional Tourism, Chamber of Commerce, Cardiff Initiative and the Council's Marketing and Tourism Service.

BUNDLE I - SUGGESTED CONDITIONS

50. Suggested Conditions 02/0823C
51. Suggested Conditions 020824C

DOCUMENT C2: APPENDICES TO MR WARDER'S PROOF OF EVIDENCE

- SW1 Extract from Adopted South Glamorgan Structure Plan
- SW2 Extract from Adopted Cardiff Local Plan
- SW3 Extract from Cardiff UDP committee draft
- SW4 Cathays Park Conservation Area
- SW5 Cardiff Castle Scheduled Ancient Monument- Record GM171 citation
- SW6 The House and Clock Tower, South Gate - Listed Building citation
- SW7 Extract from the Register of Historic Parks and Gardens
- SW8 Disability Wales letter
- SW9 Extract from Cardiff County Council City Centre Strategy
- SW10 Cadw: Overcoming the Barriers: Providing Physical Access to Historic Buildings
- SW11 St Davids Phase II illustrative Proposals
- SW12 Context Plan
- SW13 Site Photograph
- SW14 Landuse Context Pan

PLANS

Survey drawings: Visitor Centre

Plan 1: drawing no. 428 (PLE-1) 1.00; existing ground floor plan

Plan 2: drawing no. 428 (PLE-1) 1.01; existing first floor plan

Plan 3: drawing no. 428 (PLE-1) 1.03; existing plan at level of house access

Plan 4: drawing no. 428 (PLE-1) 1.04; existing plan at roof level

Plan 5: drawing no. 428 (PLE-1) 1.07; site plan: 1/500 scale

Plan 6: drawing no. 428 (PLE-1) 1.09; location plan, 1:1250 scale

Plan 7: drawing no. 428 (PLE-1) 2.01; existing sections

Plan 8: drawing no. 428 (PLE-1) 3.01; existing sections

Survey drawings: Café

Plan 9: drawing no. 428 (PLE-2) 1.00; existing ground floor plan

Plan 10: drawing no. 428 (PLE-2) 1.03; existing plan at level of house access

Plan 11: drawing no. 428 (PLE-2) 1.04; existing plan at roof level

Plan 12: drawing no. 428 (PLE-2) 3.01; existing elevations

Scheme drawings: Visitor Centre

Plan 13: drawing no. 428 (PLP-1) 1.00 Rev. C; ground floor plan

Plan 14: drawing no. 428 (PLP-1) 1.01 Rev. C; plan at theatre level

Plan 15: drawing no. 428 (PLP-1) 1.03 Rev. B; plan at house access level

Plan 16: drawing no. 428 (PLP-1) 1.04 Rev. B; plan at wall walk level

Plan 17: drawing no. 428 (PLP-1) 1.05 Rev. B; roof plan

Plan 18: drawing no. 428 (PLP-1) 2.01 Rev. B; sections

Plan 19: drawing no. 428 (PLP-1) 3.01 Rev. C; elevations

Plan 20: drawing no. 428 (PLP-1) 3.03 Rev. B; elevations

Scheme drawings: Cafe

Plan 21: drawing no. 428 (PLP-2) 1.00 Rev. C; ground floor plan

Plan 22: drawing no. 428 (PLP-2) 1.01 Rev. B; roof plan

Plan 23: drawing no. 428 (PLP-2) 2.01 Rev A; sections

Plan 24: drawing no. 428 (PLP-2) 3.01 Rev. A; elevations

Plan 25: drawing no. 428 (PLP-2) 3.02 Rev A; elevations

Proposed Landscaping

Plan 26: drawing no. CCC 826/1; landscape plan

Plan 27: drawing no. CCC 826/2; landscape plan