COMMITTEE REPORT

Committee: Planning Committee Ward: Skelton, Rawcliffe, Clifton

Without

Date: 24 June 2008 Parish: Clifton Without Parish Council

Reference: 08/00832/OUTM

Application at: Grain Stores Water Lane York YO30 6PF

For: Outline application for mixed use development comprising B1c,

C1, C2, C3 and D1 uses including parking and new access arrangements after demolition of existing warehousing units

By: Water Lane Ltd

Application Type: Major Outline Application (13 weeks)

Target Date: 2 July 2008

1.0 PROPOSAL

- 1.1 This application seeks outline approval for a mixed use development on this large site off Water Lane, Clifton. The elements comprise uses within the B1c (Light Industry), C1 (Hotels), C2 (Residential Institutions) C3 (Dwelling houses) and D1 (Non-residential Institutions) uses classes of the Town and Country Planning (Use Classes) Order 2006. The application is in outline form with only the approval of means of access being sort here.
- 1.2 The application site is allocated in the City of York Draft Local Plan as an employment site for uses B1 (Business), B2 (General Industrial) and B8 (Storage and Distribution). An indicative masterplan and supporting statement submitted with the application indicates that approx. 1.6 ha will be used for employment generating uses (B1c, C1, C2 and D1) in the north east section of the site with 4.8ha set aside for residential development.
- 1.3 The site forms part of the nearby former RAF airfield at Clifton Moor and was used to repair and maintain aircraft. It is currently covered by large aircraft hanger style buildings with associated concrete aprons, ancillary buildings and grassland. The site is 7.73ha in size and is located between Water Lane and Green Lane and they form the eastern and western boundaries respectively. There is a permanent travellers emcampment close to the northern boundary with other residential development close to the site around the other boundaries. The southern flank of the existing Clifton Moor Business Park is close to the northern extemities of the site. An area of public open space known as Clifton Backies fronts the Water Lane boundary.
- 1.4 This is a duplicate application of a previously submitted planning application 07/01992/OUTM and is identical to that. That application has been appealed against on the grounds of non-determination and this will be heard at a public inquiry on a date to be agreed.

2.0 POLICY CONTEXT

2.1 Development Plan Allocation:

Contaminated Land

City Boundary York City Boundary 0001

DC Area Teams East Area (2) 0005

2.2 Policies:

CYE3B

Existing and Proposed Employment Sites

CYH4A

Housing Windfalls

CYH5A

Residential Density

CYH2A

Affordable Housing

CYSP7A

The sequential approach to development

CYL1C

Provision of New Open Space in Development

CYED4

Developer contributions towards Educational facilities

CYGP4A

Sustainability

3.0 CONSULTATIONS

3.1 INTERNAL

3.2 Highway Network Management.

The application is supported by a Transport Assessment and Travel Plan. Whilst the planning application is a duplicate of 07/01922/OUT, the transport documents have been updated as a result of ongoing dialogue and negotiation between the applicant's consultants and officers. In fact this discussion still continues and it is intended that an update will be made at the planning committee to highlight the situation at that date.

The development site has an extant planning use and it is therefore necessary to establish the traffic implications that could arise under the scenario of such uses being brought into use. This is referred to as the 'fall back' position, and is the well established method of allowing the 'net' implications of a proposal to be understood.

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This work has been undertaken and officers are satisfied that the result of the application would be a net increase of approximately 200 vehicle movements (total, in & out), in the AM and PM peak hours, these being 0800-0900 and 1700-1800. With the PM hour seeing a marginally less figure.

The implications of this additional traffic have been assessed and demonstrate a need to improve the Water Lane - Green Lane junction. This is currently a miniroundabout, and the analysis shows that it's capacity would be exceeded with such additional loading. It is considered by officers in agreement with the consultant that the junction would operate efficiently if modified to a signal controlled junction. It would be the intention to secure such works through a Grampian condition, requiring it's completion prior to site occupation.

Further mitigation has been sought and the applicant has agreed to provide:

- a) The provision of a shared use footway/cycleway along the Green Lane frontage at a minimum width of 2.5 metres,
- b) The improvement of the footway along the Water Lane frontage to a width of 2 metres (insofar as this is within the control of the applicant),
- c) The Improvement to 6 bus stops on Green Lane including shelters, real time displays and access kerbing,
- d) The Provision of a shared footway/cycleway link through the site from Water Lane to Green Lane.
- e) Car Club funding to be secured by Section 106 obligation.
- a) to d) would be secured through Grampian conditions or appropriate funding within a planning obligation.

The above items are consistent with the council's transport policy which seeks to maximise the potential for people to travel in a sustainable manner. In addition a Framework Travel plan has been submitted, which sets out objectives, targets, measures and how these would be monitored and reviewed over time. An annual Action Plan will be prepared and managed by appointed TP co-ordinators, who will review progress in conjunction with the LPA. This document is considered to be acceptable and as above it should be secured via condition or obligation.

In addition, discussion is ongoing in relation to potential upgrading of bus services passing the site and an update will be made at the meeting.

Access to the site has been proposed in the form of 3 priority junctions. Two are proposed to Water Lane, one serving the residential scheme, incorporating a right turn ghost island, the second, a 2 acre plot containing employment uses (this being an upgrading of an existing access). The third access from Green Lane, being new and serving two, 1 acre plots of employment use. Provisional plans have been submitted for all 3 and are considered acceptable in terms of safety issues and operation. In addition, a pedestrian and cycle path is shown on the indicative master plan providing a beneficial route between Green and Water Lanes. All access points would be covered by conditions requiring the provision of appropriate engineering details prior to commencement of works.

As mentioned above further analysis of traffic flows is in progress and this may highlight a justification for further mitigation or perhaps consideration of a strengthened approach to sustainable travel. As the total assessment has not been completed at the time of writing it could be deemed that an objection should be raised, on the grounds of inadequate information.

However, as the applicant presently shows a willingness to continue with this assessment and discuss the outcomes, an objection is not raised at this point - the final officer position on this will be provided at the meeting.

3.3 City Development.

The key planning policy issues that need to be considered are the loss of employment land, following on from this the suitability of the other proposed uses on the site, specifically housing and a hotel.

Loss of Employment Land

The Grainstores site is allocated within the 4th Set of Changes to the Local Plan as a Standard Employment Site - E3a.13, which stipulates that B1, B2 and B8 uses are appropriate. The mixed use scheme proposes 1.6 ha for a potential mix of Class B1c (Light Industry), C1 (Hotel), C2 (Residential Institutions) and D1 (Non-Residential Institutions) on the north-east section of the site.

Whilst the B1c employment aspect of the scheme appears in principle to be acceptable, the other elements are contrary to policy, and must be considered in light of Policy E3b.

Employment Policies

Policy E3b (Existing and Proposed Employment Sites): requires that sites either currently or previously in employment use, will be retained within their current use class, unless there is sufficient supply of employment land to meet both immediate and longer term requirements over the plan period in both quantitative and qualitative terms. It is for the applicant to demonstrate that the requirements of this policy can be met. To do this they have submitted a range of information to support the application. This highlights that the Grainstores site has been marketed for sale by Lambert Smith Hampton, since 2004 for a range of employment uses. Information is also provided in relation to rental rates and tenure offered.

The Council undertook Stage 1 of an Employment Land Review (ELR) in the Summer which assessed future employment growth in York. This ranked the Grain Stores site as joint sixth, out of thirty six sites in terms of its sustainability for development for employment generating uses. In addition it should be noted that Stage 2 of the Employment Land Review is now due for completion in Autumn of this year. It is considered that given the size of the proposed development site and its relatively recent allocation in the Local Plan and the ongoing work in this area through the LDF, the ELR and the RSS the case for the loss of a significant element of its employment use to other uses must be robust.

In addition The Government Office for Yorkshire and the Humber (GOYH) published a 'proposed changes' document in relation to the then emerging RSS, for consultation in September 2007. This document included revised employment

growth figures for York and indicated that the potential annual job growth in the City could be up to 2,130. The document indicated that particular account needs to be taken of ongoing restructuring and modernisation of the manufacturing sector. More specifically for York the document indicates a potential net change in land in industrial and storage distribution uses between 2006 and 2021 of 90 hectares.

These figures do not accord with the findings of the Council's stage 1 ELR which identifies potential for 1060 additional jobs per annum and a negative requirement over the longer term for standard quality B1 (c)/ B2/B8 uses in the period to 2021. The ELR report does identify an overall demand for industrial space of 10,000sq.metres and states that there is pent up demand because of limited supply, particularly for small industrial units, for which no suitable sites are coming forward. It concludes that in the short term there is an acute shortage of sites and industrial space.

Given this context it is clearly important that the Council consider the need for the Grainstores as an employment site before other uses are considered. As a result of the above, a second stage of the ELR is currently being undertaken and this is due for publication in the autumn of this year. The Council should therefore have a clearer picture of local need once this is completed.

The adopted RSS identifies a significantly greater need for industrial and storage / distribution land in York than the York ELR does, and the Council may want to query this through the proposed changes consultation. Given this it would seem premature to be releasing employment land which could fulfil this need for industrial uses.

Given the size of the proposed development site and its relatively recent allocation in the Local Plan and the ongoing work in this area through the LDF, the ELR and the RSS the case for the loss of a significant element of its employment use to other uses must be robust. Additionally it must be clear that it is not considered important in the medium long term for B1, B2 and B8 uses. It must also be ensured that the Councils Economic Development Unit (EDU) do not consider it necessary to maintain the site in employment use. EDU also need to verify the marketing information submitted is appropriate.

If the in principle issues relating to the loss of employment land can be addressed it is important full consideration is given in turn to each alternative proposed uses.

Housing

The proposal includes 4.8 ha of residential uses (Class C3). The main issues in relation to housing are set out below.

The City of York Council are confident that a five year supply of deliverable housing sites can be demonstrated as required in Planning Policy Statement 3 and therefore this site is not required towards meeting the Council's housing targets.

Brownfield Land

The Grainstores site is located in York's main urban area on previously developed land, in a highly sustainable location. The site is in line requirements set out on PPS3: Housing and H4a: Housing Windfalls. This does not however override its

potentially important employment role. This will be determined in the stage 2 Employment Land Review.

Residential Density

In relation to residential density, Policy H5a and PPS3 state that 40 dwellings per hectare or more would be appropriate in this location. It should be noted that at this outline stage the number of housing units has not been decided therefore the housing density on site cannot be calculated at this stage. The mix of housing should be in line with the Councils Housing Market Assessment which indicates that greatest demand across York is for 2-bed and 3-bed homes, across all sectors (market, social rented and intermediate i.e. discount sale at a meaningful affordable level). The Strategic Housing Market Assessment 2007 (SHMA) also concludes that demand is greatest for houses rather than flats. Affordable Housing should be provided in accordance with the Council policy H2a of 50%.

Hotel

A 150 bed 3* (or above) hotel has been proposed as part of the Grainstores application. PPS6 states that hotels are considered to be a main town centre use, to which the sequential test applies. Applicants proposing hotels are required to demonstrate:

- a) the need for development;
- b) that the development is of appropriate scale;
- c) that there are no more central sites for the development (adopting the sequential approach to site selection);
- d) that there are no unacceptable impacts on existing centres;
- e) that the locations are accessible.

As hotels are deemed to be a town centre use the sequential approach applies. The applicants have carried out a sequential test and have assessed need. In order to determine if this research for the need of a hotel is robust discussions must be carried with the Economic Development Unit in order to establish their full support, and establish that the proposal fits with the Councils Tourism Strategy. Only following the consideration of other available sites, and dismissing them through examining the availability, suitability and viability should the Grainstores site be considered for a hotel site.

3.4 Economic Development Unit.

The applicant seems to have only tested the market for employment use based on the existing buildings and layout. There may be potential for the full site to be marketed for redevelopment as employment use, but the evidence submitted does not suggest that this has been tested.

It is important to ensure that there is no loss of employment land in the city. The current employment on the site is minimal and the proposal has the potential to increase this number, however it will not maximise the employment potential by using the whole site for employment purposes. The planning process, if minded to approve the application, must be confident that there is sufficient supply of employment land to meet the city's immediate and long-term land requirements in both quantative terms and qualitative terms.

3.5 Archaeology.

The site lies to the north of the historic core of the City of York. The site lies outside the Area of Archaeological Importance. The site consists of an area of land covering approximately 7.5ha. The site is bounded by Water Lane and Green Lane and is centred at SE59365442. The site consists of hard standing and former aircraft hangers associated with Clifton Airfield. The site is almost completely flat apart from some perimeter bunds. Ground level is at around 14m AOD.

About 500m to the to the north-east of this site lie the scheduled remains of two Roman practice camps (mon no 30152, SE 59655484; and mon no 30127, SE59885488). This type of monument is often found in clusters of up to ten or more camps. As yet archaeological work on the development sites along Water Lane has failed to produce evidence for more of these camps in this locality, although two have been discovered and investigated at Monks Cross.

Given this archaeological background, the applicant has been asked to submit a Desk-Based Assessment and to carry out an archaeological evaluation of the site. The evaluation has been carried out by the York Archaeological Trust. It started on the 8th October 2007 and was completed on 26th October 2007. I visited the site on 24th October and inspected the trenches. I do not expect a report on the results of the archaeological evaluation to be ready before the suggested Committee date of 22nd November. However, I am able to offer the following comments based on my site visit and on the discussions I held with the YAT site supervisor.

A total of 15 trenches has been excavated. These trenches revealed limited areas where archaeological deposits might survive. A large percentage of the site has been subject of extensive surface reconstruction to a depth of up to 1m. This has truncated the surface of natural to such an extent that it is unlikely that any archaeological deposits will survive within these areas of the site.

The aircraft hangers which stand on the site are date from the period when the airfield was developed during World War II. These, and their associated buildings on the site are of great interest and merit recording prior to any demolition works

Recommends approval subject to the imposition of a watching brief condition and an agreed programme of archaeological work.

3.6 Education Officer.

Confirm that the Council are likely to require an S106 contribution for both Primary and Secondary sectors and may also require a Foundation level S106 requirement as well. However, as we don't have figures for the number of 2 or more bedroom houses, I'm unable to give an accurate calculation. When the full detailed planning application comes in with a breakdown of accommodation types, we'll be able to provide a breakdown of S106 requirements.

3.7 Air Quality Officer.

Need to establish the likely air quality implications of this proposal. In order to assess this, the Council need to know if any road links with existing AADT flows of >= 10,000 vehicles per day will experience changes in flow of more than 5% (increase). We are particularly interested in the likely additional traffic movements

around Clifton Green / Bootham. Currently unable to derive this information from the current traffic assessment. I have copied this to Howard in the hope that he can offer some advice on likely magnitude of any changes in these areas. Noted that further SATURN modelling work is planned, and it would be useful if the areas highlighted above could be included in this work.

3.8 Ecology Officer.

There is little ecological interest on this site. The only interest in an ecological aspect would be the linking in of any open space for the site to Clifton Backies and ensuring that due regard is given to biodiversity enhancement.

3.9 Landscape Architect.

(Comments as taken from the concurrent application which has gone to appeal) Although it is accepted that the masterplan is indicative, it must at this stage illustrate the correct quantity of public open space (POS) that would be expected of the proposed housing allocation. To this end the masterplan is unsatisfactory. A scheme of this size would warrant an imaginative, site-specific, local equipped area of play (LEAP). A location within the blue residential zone (on the layout plan) between Victoria Farm Estate and the employment zone may be appropriate in that the employment amenity space and the residential amenity space could be combined to provide a substantial all-encompassing POS. The design and access statement concurs with this, but the two plans do not illustrate this principal.

As well as a LEAP there would also be a requirement for a LAP(s) immediately within the housing areas combined with 'home zone' principles (to be agreed with Highways).

There is no equipped play area on the stray. The nearest is at Brailsford Crescent and Landalewood Road; these serve dense areas of housing and one would need to cross busy roads to access them. There is a green amenity space at the end of Handley Close/Whitley Close; this is not equipped and there is no direct pedestrian connection.

Clifton Backies/Bootham stray has a presence and an entry point along Water Lane at the junction with Woodland Chase. The majority of this section lies opposite Victoria Farm Estate. Nonetheless I feel it would be important to make an open space connection between the stray and the site at this point.

The properties on Harrow Glade that back onto the site have short rear gardens. Although these currently back onto an industrial site, there is a green earth mound between them and a substantial distance to the existing store. In order to protect the amenity of these residents there should be a reasonable easement between the boundary and new buildings. The suggested 15m length (10m garden plus 5m depth planting) on the layout would be a suitable minimum; this may be more depending on proximity of existing properties. However the masterplan does not appear to reflect these dimensions. The scheme proposes planting around the boundary of the site which would be within individual private ownership. The retention of such planting should not be conditioned, and is difficult to enforce, as has been proved at the Tenneco site (ref: 02/2308). Therefore it is better to rely on suitable garden lengths to provide mitigating distances, rather than belts of planting in private ownership. Nonetheless introducing trees and shrubs should be encouraged by initial implementation through an approved landscape scheme.

3.10 Environmental Protection Officer. Comments awaited.

EXTERNAL

3.11 Clifton Without Parish Council.

Object. The site does not meet the land allocation criteria.

3.12 Environment Agency

No objections. Commitments have been received to drain the existing system without additional flow or volume. However the applicant is advised to consider a further reduction eg: 5-10% to allow for residents introducing hard landscaped areas, without the requirement for Planning permission. The Agency would also welcome the use of SUDS techniques to assist in this. 2 conditions recommended.

3.13 Yorkshire Water.

Comments awaited.

3.14 Neighbours and Third Parties.

Nearby residents were consulted by letter and site notices placed close to the site. 7 letters of objection have been received making the following observations.

- i) Object to the hotel. Would adversely affect neighbouring residential areas with increased noise and disturbance particularly at weekends, evenings and unsocial times.
- ii) Existing area is predominantly residential and light industrial, the latter predominantly opening daytime only.
- iii) Hotel would increase volume of traffic and will not benefit local residents and would be better sited close to the City centre.
- iv) Concerned about noise from the hardstanding.
- v) Area already has a traffic problem so to build lots of houses would be madness.
- vi) There are offices in the area which have been empty for years.
- vii) Rawcliffe has had its fair share of development over the last 20 years.
- viii) Site should be returned green fields.
- ix) Very concerned about traffic generation in the area as already gridlocked around the Green Lane / Water Lane / Clifton Moorgate junctions as well as at the Water Lane / Clifton Green and Rawcliffe Lane junctions. There should no more building in the Clifton area until this is improved.
- x) Water Lane has a weight restriction imposed on it. The extra traffic passing on this road may effect the foundations of dwellings in the area.

4.0 APPRAISAL

4.1 KEY ISSUES.

- Allocation of the site in the local plan.
- Local Highway issues.
- 4.2 The application site stands within the urban area of York and is allocated in the 4th set of changes to the local plan as a standard employment site. Key national

guidance to be considered is contained within PPG3 (Housing) and PPS6 (Planning for Town Centre). At a regional level the Regional Spatial Strategy guidance on employment need is material. At local level, initial consideration has to be given to Policy E3b (Existing and Proposed Employment Sites) and the Employment Land Reviews which have taken place as part of the Local Development Framework process. The key issues that need to be considered here are the loss of employment land and following on from this the suitability of the other proposed uses on the site, specifically housing and a hotel. Policy E3b (Existing and Proposed Employment Sites) requires that sites either currently or previously in employment use, will be retained within their current use class, unless there is sufficient supply of employment land to meet both immediate and longer term requirements over the plan period in both quantitative and qualitative terms.

- 4.3 The basic analysis of the case is that the site is allocated for employment use, in particular those uses within the B1, B2 and B8 use classes. This application seeks a predominantly residential use with some employment use shown towards the eastern corner of the site. However this employment use is restricted to a mixture of B1(c) Light Industry, a hotel (C1) where a possible 150 bed hotel is mentioned, non residential institutions (C2) where no end use is identified but which could include a hospital, a Nursing Home, a residential school or a training centre and Class D1 which includes medical centres, creches, public libraries and places of worship. A possible new church is mentioned in the supporting statement accompanying the application. The supporting statement on this says that 'such a facility would be aimed at providing a space accessible to all members of the community. A church would offer no facilities for community initiatives to serve both new residents generated from the proposed residential development and existing residents in the surrounding Clifton Moor area'. There is no indication however as to how this would constitute a significant employment generator. In any event, uses within Classes C1, C2 and D1 are not standard employment generators and are contrary to the uses specified in the site allocation and must be considered in light of Policy E3b.
- 4.4 Officers consider that this policy context is the overriding consideration here and the detailed response and considerations of the Council's Policy officers are at para. 3.3 above. It is not the intention of the case officer to repeat these in detail here but these comments are a material consideration in this case and members are referred to them. Presently, the second stage of the Employment Land Review is being undertaken and is due for publication in the Autumn and this will give a more up to date assessment as to the employment need and potential of the land following on from the conclusions in the RSS. Given the relatively short timescales involved and the importance of such a document in assessing the strategic importance of this site, it is considered inappropriate to consider the release of this land to support other uses, the vast majority of which are outside any recognised employment use. To this end, the application submitted here is considered by officers to be premature.
- 4.5 The applicants have marketed the site since January 2006 and according to the supporting statement accompanying the application this involved the circulation of a brochure, the erection of a banner, two advertisement boards at the entrance and corner of Water Lane, mailshots to suitable companies and industrial property agents and press releases on the Estates Gazette Property Link and the Lambert Smith Hampton. This, they report, resulted in very limited enquiries, most of which were for

short term use at unviable rental levels and well below market rates. This evidence therefore helps to support their view that the site, despite its allocation, is not suitable for employment use anyway. However, the applicant seems to have only tested the market for employment use based on the existing buildings and layout and not on the sites potential for redevelopment in line with the allocation. The applicants own supporting statement describes the buildings on site as 'inflexible and incapable of meeting the modern requirements of potential occupiers'. Clearly the existing buildings are very large and do offer limited use potential and therefore it is not necessarily a surprise that little interest in the site was shown. Officers do not consider that marketing it in this way gives an accurate reflection of the sites overall market potential for a wider employment redevelopment involving smaller and more diverse units. The Council, in allocating the site, does not make reference to, or expect that, the existing buildings would be reused. There is the potential for the full site to be marketed for redevelopment as an employment use, but the evidence submitted does not suggest that this has been tested.

- 4.6 The applicants also state that the surrounding uses (residential), existing access arrangements, restrictions for HGV's and the local infrastructure further limit the potential for major industrial development at the site and that this would probably limit the use across the whole site to only B1c (light industry), which would be inappropriate. However, such uses can and do sit together in a perfectly acceptable way providing it is carefully planned and controlled.
- 4.7 On the alternative uses proposed, the majority of the site (4.8ha) is set aside for housing and officers would concede that in Development Control terms, the site is suitable for residential development, subject to the standard development control criteria and appropriate contributions. However, this aside, part of the applicants case is that the City of York Council do not have sufficient housing land to meet a deliverable 5 year supply as required in PPS3. However, officers disagree with this assertion and consider that there is a five year supply of deliverable housing sites within the York area and as such this site is not actually required for housing. This adds further weight to the case that full and proper consideration be given to its use as a employment site as allocated in the draft local plan before any different use is considered.
- 4.8 It is intimated that the proposed hotel (Class C1) would be a minimum 3 star, approx 150 room hotel although no specific details to this end have been submitted. The applicants state that this could create up to 100 jobs. They have undertaken a sequential test as required in PPS6 and the approach taken in relation to this looks suitable. As previously intimated however, such a use falls outside of the B1, B2 and B8 allocation of the site and is not generally a recognised employment use when considering employment based land uses. This is again considered premature and contrary to Council Policy. The further comments of the Council's Tourism Manager are awaited on this.

Highways.

4.9 Council's highway officers are in continued detailed consultation with the applicant's transport consultant with regard to the submission of further information and this will be updated at the meeting as required. For the detailed comments on

this, members are referred to para. 3.2 above and also to para. 3.7 and the comments of the Council's Air Quality officer which are also relevant on this issue due to air quality concerns at the nearby Clifton Green junction. Again, updates will be provided on this if necessary at the meeting.

5.0 CONCLUSION

5.1 The site is allocated for employment use in the City of York Draft Local Plan and the Council are currently going through various stages as part of the LDF programme to ascertain employment need throughout the city. This site has been identified in the Employment Land Review Part 1 as an important site and at this stage there is no evidence to contradict this. Work is on-going on this through the Employment Land Review Stage 2 and this expected to be completed around September 08. The application for this mixed use development, mainly consisting of residential and other non-conforming employment uses is therefore considered premature and officers consider that this should be resisted accordingly.

COMMITTEE TO VISIT

6.0 RECOMMENDATION: Refuse

The land subject to this application is allocated within the 4th Set of Changes to the City of York Draft Local Plan as a Standard Employment Site. Other than the stipulated B1c use, the proposed uses are contrary to this allocation and specifically Policy E3b of the City of York Draft Local Plan. The Council consider that there is no clear evidence at this time that the site is not required for the specified employment uses and therefore the application is considered to be premature and therefore should be resisted.

7.0 INFORMATIVES:

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