NOTIFICATION OF REFUSAL OF PLANNING PERMISSION

PROPOSALS: Demolish existing workshop and erect two dwellings.

LOCATION: Workshop, Rouge Huis Avenue, St. Peter Port.

APPLICANT: Futureun Pension Scheme

I refer to the application referred to below received as valid on 03/02/2014 regarding the above proposals as described more fully in the application and drawings referred to below.

Date of refusal of permission: 28/05/2014

Drawing Nos: Dunnell Robertson Partnership: 1968-SK-01A, 02C, 03B, 04B, 05B, 06C, 07C, 08C, 09, 10B, 11B, 12B & 13B

Application Ref: FULL/2014/0460

Property Ref: A205050000

The Department has decided to refuse your application under the provisions of section 16 of the Land Planning and Development (Guernsey) Law, 2005 for the following reasons:-

1. The proposal would result in the loss of existing industrial accommodation, contrary to Urban Area Plan Policy EMP9. In particular, it is considered that the site does have the potential to represent an attractive affordable option for “low value” industrial businesses and start-up businesses seeking small, basic premises.

2. Due to the characteristics of the site, and relationship with the surrounding area, the site is considered unsuitable for new residential development. The character of the area comprises garaging and parking to the rear of Victorian terraced housing. The site has no real sense of place, limited outlook and little attraction as a living environment. The application is considered contrary to Policy HO2.

3. Although the proposed design has an 'industrial' feel, which is not inconsistent with the current use of the site, it results in a bulky building with marked horizontal emphasis, and which does not reflect the predominant character of the conservation area surroundings. The proposed design does not conserve or enhance the character and appearance of the Conservation Area and the application is considered contrary to Policy DBE7.
OTHER REMARKS:-

Right of appeal against planning decisions

Your attention is drawn to the provisions of Section 68(1) of the Land Planning and Development (Guernsey) Law 2005, which provides a right of appeal, against a decision to refuse an application for planning permission or outline planning permission to the Planning Tribunal on the merits. An appeal to the Planning Tribunal under section 68 of the Law against this decision must be made before the expiry of the period of six months beginning with the date on which the Department made this decision.

Copy of representations made

In reaching this decision the Department took into account any written representations arising from consultations made under Section 11(1) of the Land Planning and Development (General Provisions) Ordinance, 2007 ('the Ordinance'). A copy of any representations made to the Department under section 11 will be included with this decision in accordance with section 19 of the Ordinance.

A J ROWLES
Director of Planning
RECOMMENDATION - Refusal with Reasons:

REASONS FOR REFUSAL

1. The proposal would result in the loss of existing industrial accommodation, contrary to Urban Area Plan Policy EMP9. In particular, it is considered that the site does have the potential to represent an attractive affordable option for “low value” industrial businesses and start-up businesses seeking small, basic premises.

2. Due to the characteristics of the site, and relationship with the surrounding area, the site is considered unsuitable for new residential development. The character of the area comprises garaging and parking to the rear of Victorian terraced housing. The site has no real sense of place, limited outlook and little attraction as a living environment. The application is considered contrary to Policy HO2.

3. Although the proposed design has an ‘industrial' feel, which is not inconsistent with the current use of the site, it results in a bulky building with marked horizontal emphasis, and which does not reflect the predominant character of the conservation area surroundings. The proposed design does not conserve or enhance the character and appearance of the Conservation Area and the application is considered contrary to Policy DBE7.

OFFICER’S REPORT

Site Description:

The site comprises a workshop building adjacent to two groups of lock-up garages, and the rear access, gardens and parking of 2½ storey terrace on the west side of Rouge Huis Avenue. The workshop, garages and parking, together with the rears of properties on Elm Grove and Brock Road are accessed via two narrow lanes from Rouge Huis Avenue. The site of the Old Boys Grammar / GCFE Brock Road annex is to the west of the site and is currently being development for housing. A granite wall stands on the boundary of the sites. The workshop is within an urban conservation area. The building is presently vacant, having previously been used as a builder’s depot/store/workshop.

Relevant History:

2011 – Meeting to discuss whether site had potential for residential development.
2012 – Change of ownership

2012 – Meeting to discuss possible repairs/redevelopment required due to poor condition of building.

2013 – Meeting to discuss possible redevelopment for housing.

2013 – Further request for meeting to discuss conversion to residential.

**Existing Use(s):**

General Industrial – Use Class 38

**Brief Description of Development:**

This application is to demolish the workshop building and build a pair of semi-detached dwellings, on two levels, each to comprise a living/dining/kitchen, two bedrooms, a terrace, a courtyard and parking for two vehicles. The proposed houses are of a contemporary design, finished in granite, render and timber cladding, with profile metal roof.

The application was accompanied by a Planning and Design Statement setting out details of the site and the proposal and including letters from Watts & Co, outlining the client’s difficulties securing an occupier for the building, Cooper Brouard, commenting on the marketability of the proposed development, CBL, referring to the existing structural condition and Guernsey Housing Association, confirming possible services connections.

The application was also accompanied by a written statement from Mourant Ozannes. It refers to pre-application discussions and to the locality being predominantly residential. It refers to policy EMP9 (on protecting industrial sites) and to the Strategic and corporate Plan. It argues the site is no longer suitable for industrial use and more suited to residential. It also refers to conservation area policy DBE7, demolition policy DBE9, new housing policy HO2 and amenity policy GEN12, concluding that the proposal does not contravene these, and there are no legal reasons to refuse the application. The submission included copies of letters and meeting notes, as well as a copy of the permission and Development Brief for the adjoining Guernsey Housing Association site next door, and again including the letters from Watts & Co, Cooper Brouard, CBL and Guernsey Housing Association, referred to above.

**Relevant Policies of any Plan, Subject Plan or Local Planning Brief:**

EMP9, DBE9, DBE7, HO2, CEN6, GEN12

**Representations:**

5 letters of representation, from residents of Rouge Huis Avenue, objecting to the proposal on a number of grounds;
- loss of light industrial property, shortage of “Fred in the Shed” premises has been highlighted over the last few years, with general economic upturn there will be a need for such premises, no evidence of comparable rents,
- insufficient evidence that existing building is no longer required or suitable for its original purpose,
- previous owner tried to gain planning permission several times,
- wonders why developer bought the property, he should have known of the difficulty of finding tenants,
- condition of building should have been known when he bought it,
- character of area is not strongly residential, rather driveway, turning and garages, agree with Planning’s letter of 20 August 2013,
- proposed dwellings are ugly, imposing, bulky and out of character, overdevelopment, density too high, the proposal will not conserve or enhance the character and appearance of the area, policy DBE7,
- demolition not justified in terms of policy DBE9
- inappropriate for residential use, not suitable having regard to the existing characteristics of the site, landlocked, accessed via narrow lane, will overlook surrounding properties, site has poor outlook, not a satisfactory living environment, level of amenity, limited daylighting and privacy, no garden space, not a pleasant living environment,
- effect on adjoining properties, first floor windows would overlook, could be made opaque, loss of light, will spoil existing views,
- effect on roads and traffic, increased traffic would have a detrimental effect on properties, historically traffic to this building has been low,
- proposal is at narrow point of driveway, will make accessing existing parking areas difficult
- effect on road surface during construction, could be made good after the works
- only one site notice on site, no attempt to contact residents, high volume of paperwork submitted, assume the idea is to make a ‘fast buck’.

Consultations:

Commerce and Employment Department

Comment on the application as follows:

- The planning application form supplied states that the total site area is 449sqm (4,833sqft) and includes two car parking spaces.

- The Dunnell Robertson Partnership (“DRP”) design statement supplied states that the area of the existing main building is 182sqm (1,959sqft). The DRP ground floor plan (drawing number 1968-SV-02) supplied indicates that the main building is divided into two workshop areas with two ancillary office sections. The lavatory and boiler are located in two smaller (11sqm/118sqft) buildings.

- The application includes a letter dated 26 July 2013 from Watts & Co, which states that the internal floor area of the workshop building is arranged over the ground floor and part mezzanine level. The property details (not supplied with the application) available from the Watts & Co website indicate that the mezzanine floor covers half of the workshop. These property details state that
“[t]he manner in which the property interconnects offers potential to divide the premises into two individual units each benefitting from its own entrance (including separate pedestrian/client access) and offices”.

• The submission from Mourant Ozannes suggests that the workshop was built in the late 1920s. The DRP design statement describes the structure as made of single skin block work built with corrugated roofing to the double heighted space and flat roof membrane to the remainder and that part of the building is built off the boundary wall and is “sub-standard”.

• The effect of this application would be to remove from the application site from the Island’s stock of existing industrial premises. The Department understands that Policy EMP9 of the Urban Area Plan is therefore applicable. That policy states:

“The change of use of existing industrial land and accommodation will only be permitted where it can be clearly demonstrated that the site or premises is no longer suited in land use terms to continued industrial use having regard to:-

a) the standard of accommodation and the level of demand for such premises;

b) the suitability of the existing access to the site for industrial purposes and the likelihood of improving the situation; and

c) the potential for remedying land use conflicts with neighbouring users, particularly where amenity would be improved by the removal of noise, smells or traffic conflicts”.

• Interpretation of Policy EMP9 is properly a matter for planners; however, the Department, in commenting on this application, has had regard to the evidence submitted in support of the application, particularly in relation to the standard of accommodation and the level of demand for such premises; and the suitability of the existing access to the site for industrial purposes and the likelihood of improving the situation.

• With regard to Policy EMP9 (a), the standard of accommodation, the design statement supplied states that the building is in “very poor condition” and refers to the letter dated 14 November 2013 from CBL Consulting (Chartered Structural and Civil Engineers), included in the application, which states, with reference to inspections carried out in 2012 and June 2013, that: “...the general condition of the building... is quite poor, suffering from a number of significant structural defects and whilst I do not believe the building to be at risk of failure, the remedial works required to allow for its re-use would be substantial... I am of the opinion that the cost and extent of work required to allow the building to meet the most basic standards would be well in excess of its cost for demolition and reconstruction”.

The Department is aware that as at 12 March 2014 these premises were still being marketed on the Watts & Co website. The Watts & Co property details do not refer to the structure as being poor, and describe the offices as “well presented”.
With regard to Policy EMP9 (b), the level of demand for such premises, the application includes the letter dated 26 July 2013 from Watts & Co, which states that the firm marketed the property from March 2012 as a whole and in part for variety of uses falling within industrial and storage and distribution use classes. Despite undertaking viewing with 11 parties, Watts & Co reports that it was unable to secure a tenant. Watts & Co explains that the viewings were conducted with “Fred in the Shed” type operators (carpenters, car mechanics, fulfilment firms, and those within the building trade and enquiries were also received relating to storage), but that the feedback from these operators was that the site was not suitable for their purposes because it has limited external yard access and narrow restricted access; it is located within a residential neighbourhood down series of one-way road networks; and because of condition of the property. Watts & Co comments that the overwhelming factor in the lack of take-up was restricted access to the site with very tight entrance/egress to the public thoroughfare at Rouge Huis. Watts & Co point out that such occupiers would have vehicles larger than average cars, and “the width of the roadway and tightness of the corners means it is virtually impossible for such vehicles to gain access to the site”. Watts & Co further comments that the establishment of a new point of access to the site would not be possible because it is effectively “landlocked”. Watts & Co comments: “…the current use classification is no longer appropriate for the Subject Property and...it should now be considered to have a redundant use”.

With regard to Policy EMP9 (c) remedying land use conflicts with neighbouring users, the Department would refer to the comments of the Environment Department planning officer in the letter dated 20 August 2013 to DRP, in which the planning officer states: “The [Environment] Department generally seeks to support existing industrial premises, including ‘Fred in the Shed’ type accommodation”... “Having reviewed the sketch plans submitted on 2 August 2013 the [Environment] Department remains of the opinion that the potential for residential use is very limited and that the site would be better staying for low key industry”.

Although the site is not contiguous with other industrial sites the Department would draw attention to the text of the Watts & Co property details for these premises (available from the Watts & Co website as at 12 March 2014), which state: “The warehouse and yard area is accessed by way of a looped access road leading directly off Rouge Huis and providing access to a number of other industrial workshops, stores and private owned garages”.

In considering the potential loss of the site for industrial purposes, the Department is mindful of the results of the Policy Council’s Land Use Modelling report (dated December 2012), which forecasted a decrease in demand for industrial premises over the period 2012-2022 of -6.6%. The same report, however, also forecasted an increase in demand of 4.8% over the same timeframe for premises for storage and distribution use.
According to Cadastre records cited in the Environment Department’s ‘Guernsey Employment Land Study 2013’ ("GELS 2013"), there were at the time of publication a total of 440 industrial premises on Guernsey providing a total of 221,000sqm (2,378,824sqft) gross external floor area. The most recent evidence available to the Department concerning supply is provided by the Environment Department’s half-yearly ‘Employment Land Monitoring Report’ ("ELMR") for July to December 2013, which stated that 54 industrial, storage and data centre premises were available to let in December 2013, a total area of over 33,074sqm (356,018sqm), and a decrease of 4,222sqm (45,447sqft) since June 2013. The total area represents an amalgamation of premises available for storage and distribution as well as premises for industrial uses, however, the ELMR states that 64% of that total area is available for storage and distribution (excluding data centres). The ELMR states that the level of vacancy in storage premises remains approximately 14%, which suggests an oversupply in the market. Conversely the vacancy level of industrial premises is 3.4% “suggesting a tight marketplace”.

GELS 2013 reported feedback received from commercial property agents that low quality, cheap workshops of between 400-600sqft (40 – 60sqm) are in demand from firms in the building trade, landscape gardeners, car mechanics and repair workshops. The DRP design statement states that the existing building (workshop) measures 182sqm (1,959sqft) in area. The workshop is divided into two workshop areas (with two ancillary offices).

GELS 2013 reported feedback from commercial property agents that the industrial sector is very price sensitive, with rents being between £8-£10/sqft (£86-£108/sqm) for a standard specification; and that businesses seeking small, basic premises are often looking to pay £3-4/sqft (£32-£43/sqm), which given the high construction costs on the island is not viable for a new build. The same study commented that whereas high value businesses (e.g. ICT-based companies) appear to find appropriate premises eventually, low value businesses struggle, and can be susceptible to being undercut by UK traders due to the relatively high Guernsey business costs.

In October 2013, the Department responded to the ‘Key Messages, Issues, and Options’ consultation stage of the Environment Department’s Development Plan review. In its response, the Department commented that it would wish to see the development of means to ensure an ongoing adequate supply of land for industrial purposes. The Department also commented that it would wish to see greater flexibility within the Storage and Distribution and Industrial use classes in order to support economic development opportunities. The Department indicated its support for changes of use from light or general industry to storage and distribution to ensure the best is made of existing stock, and was supportive of the proposal to facilitate the upgrading of existing stock to provide easily adaptable accommodation which can respond to changes in occupier, technology or business circumstances. It is also relevant that in its response to the Development Plan consultation the Department indicated its support to the proposal that would allow for change of use of isolated sites within the main centres that are surrounded by non-industrial uses.
• The Department notes the anticipated decline in demand for industrial premises over the period 2012-2022 as forecasted by the Policy Council, but is also mindful of the “tight marketplace” for vacant industrial premises reported by the Environment Department in the ELMR for July to December 2013. Against this background, the Department considers that it is important to ensure that suitable sites for industrial uses remain available to meet existing and potential future demand across a spectrum of affordability.

• The Department recognises the submission made concerning the condition of the existing built premises, but would draw attention to the letter dated 14 November 2013 from CBL Consulting, which states that despite a number of significant structural defects the building is not believed to be at risk of failure. The same letter states that the cost and extent of work required to allow the building to meet the most basic standards would be well in excess of its cost for demolition and reconstruction; however, the letter does not provide an estimate of the potential cost and therefore the Department is not in a position to comment on whether it would be unreasonable to expect a potential developer to either repair or demolish and reconstruct the premises for continued industrial use. The Department is also mindful that despite these issues the property, as at 12 March 2014, continued to be marketed for industrial uses, with the ancillary office area described in the property details as “well presented”.

• The Department recognises the submissions made in the application relating to the limitations of these premises for continued industrial use because of restricted access, and the Department accepts that the likelihood of improving the situation is not great given the “landlocked” nature of the site. These ostensibly detrimental factors could, however, serve to make these premises more affordable to small and start-up businesses that may otherwise not be able to afford to rent higher quality premises.

• The letter dated 27 January 2014 from Watts & Co states that despite marketing of these premises, no such take-up occurred. The same letter does not, however, comment on whether the rents sought were commensurate with the quality of the built premises and the restricted nature of access to the site. The Department would anticipate that rents sought for these premises would need to be set at a level that reflected these stated limitations and therefore the site has the potential to represent an affordable option for “low value” industrial businesses seeking small, basic premises.

• As previously stated, GELS 2013 reported feedback from commercial agents that businesses seeking small, basic premises are often looking to pay in the region of £3-4/sqft (£32-£43/sqm), although it is not clear whether these figures refer solely to rent for built premises or for a combination of built premises and land. The property details available from the Watts & Co website (as at 12 March 2014) state that the rental price sought for these premises is £22,000 (assumed to be per annum). The Watts & Co property details explain that the unit has a
gross internal area of approximately 2,490 sqft (231sqm) and that there is also a further 900sqft (84sqm) of external yard space which, if required, is suitable for approximately three or four parked vehicles or alternatively used as additional storage.

- Based on the Watts & Co property details available online to prospective tenants, and taking into account only gross internal area of 2,490 sqft (231sqm) this suggests rental prices in the region of £8.83/sqft or £95.24/sqm. Including the external yard to create a total site area of 3,390sqft (315sqm) suggests rental prices in the region of £6.49/sqft or £69.84/sqm. By these estimations, the rental price for these premises would appear to be broadly in line with those for standard specification industrial premises but higher than that sought by businesses seeking small, basic premises (although the Department acknowledges that the prices sought by such businesses may well represent what they would like to pay, which is not necessarily a reflection of what is reasonable to expect to pay).

In conclusion, and with regard to Policy EMP9, the Department notes the submission that the standard of accommodation is not high and the existing access to the site is not good with little likelihood of improving the situation. These otherwise detrimental factors, however, have the potential to make these premises more affordable to businesses seeking industrial premises at the lower end of the price spectrum. The Department notes the submission regarding the demonstrated level of demand for these premises, but queries whether take-up might be encouraged by setting the level of rent sought at a level more commensurate with the stated limitations of the site and built premises. With regard to land use conflicts with neighbouring users, the Department refers to the views expressed by the Environment Department to DRP that the site would be better as a location for low-key industry than for residential use.

In view of the above, and the current “tight marketplace” for vacant industrial premises, the Department does not wish to limit opportunities for small and start-up businesses to access affordable premises within the industrial use classes. The Department therefore does not support the proposal by Futureun Pension Scheme to demolish the existing workshop and erect two dwellings at the Workshop, Rouge Huis Avenue, St Peter Port.

**Constables of St Peter Port**

No objections. It should be noted however that it will not be possible to access these properties with a refuse compactor truck, therefore refuse and recyclates would have to be brought to Rouge Huis Avenue for collection.

**Summary of Issues:**

Loss of industrial site, whether suitable for housing, access and amenity matters, any effects on adjoining properties, design and appearance of proposed development.
Assessment against:

1 - Purposes of the law.
2 - Relevant policies of any Plan, Subject Plan or Local Planning Brief.
3 - General material considerations set out in the General Provisions Ordinance.
4 - Additional considerations (for protected trees, monuments, buildings and/or SSS’s).

The shed is currently authorised for industrial use, having been used until recently as a builder’s depot/store/workshop.

As consistently identified in response to enquiries, a primary issue is whether the loss of industrial premises would be significant, within the context of Urban Area Plan policy EMP9, which generally seeks to support existing industrial premises.

The preamble to the policy notes, ‘Suitable industrial land sites represent a scarce economic resource. In order to ensure that sites continue to be available for existing firms and emerging companies, sites that are well suited to industrial use will be protected. In some cases, the standard of accommodation provided and site constraints will mean that industrial use is no longer appropriate.’

Policy EMP9 states:
‘The change of use of existing industrial land and accommodation will only be permitted where it can be clearly demonstrated that the site or premises is no longer suited in land use terms to continued industrial use having regard to:-
a) the standard of accommodation and the level of demand for such premises;
b) the suitability of the existing access to the site for industrial purposes and the likelihood of improving the situation; and
c) the potential for remedying land use conflicts with neighbouring users, particularly where amenity would be improved by the removal of noise, smells or traffic conflicts.’

In terms of criterion a) standard of accommodation, the policy is referring to the standard of the existing industrial accommodation, and not (as implied in paragraphs 39 – 41 of the applicant’s written submission) to the standard of the proposed residential accommodation.

In this case it is accepted that the standard of the existing accommodation is not at the top end of the spectrum, but neither is it considered to be unsuitable. The letter dated 14 November 2013 from CBL Consulting states that despite a number of significant structural defects the building is not believed to be at risk of failure, and the property continues to be marketed for industrial uses, with the ancillary office area described in the property details as “well presented”. Furthermore, whilst the application refers to limitations of these premises for continued industrial use because of restricted access, this could actually serve to make the premises more affordable to small and start-up businesses that may otherwise not be able to afford to rent higher quality premises.

In terms of demand, the letter dated 27 January 2014 from Watts & Co states that despite marketing of these premises, no take-up occurred. However, it does not serve to
establish whether the rents sought were commensurate with the quality of the premises and the restricted nature of access to the site. Rent sought would need to be at a level that reflects these limitations. It is considered that the site does have the potential to represent an affordable option for “low value” industrial businesses seeking small, basic premises.

Criterion b) concerns the suitability of the existing access to the site for industrial purposes. The access is indeed narrow, but it remains the same as it has always been, the access has not been altered in any way recently that would prevent it continuing to be used as it has in the past.

Criterion c) addresses remedy of land use conflicts with neighbouring users. The Department notes that the previous use and operation of the premises continued over a number of years, and is not aware that there were any land use conflicts with neighbouring users, which could now be resolved by this proposal.

The proposal fails to meet the requirements of policy EMP9.

Furthermore, the Commerce and Employment Department does not support the application, for the reasons stated above.

If it were accepted that the existing industrial use could be lost, the suitability of the site for residential development has to be considered.

Policy HO2 states:—
“Proposals for housing development within the Settlement Areas and on previously developed land will generally be permitted provided that:—
a) the site is suitable having regard to the existing characteristics of the site and its relationship with the surrounding area;
b) the development is acceptable in terms of design, density and amenity; and
c) the development does not conflict with other relevant policies of the Plan.”

The Urban Area Plan defines ‘amenity’ as “The ‘feel’ of a place in terms of it being pleasant or agreeable”.

The proposed residential development is close to the GHA development to the west. It is however accessed by and associated with the rear of Rouge Huis Avenue. The site is bounded to north and south by lock up garages. It is not considered that the adjacent lock ups could offer a site appropriate for mews type development. The rear of the terrace has been developed in a piecemeal, rather fragmented fashion and presents little enclosure to the lane. The residential development of the subject site would itself introduce a constraint on the valued facility of off street parking.

Due to the characteristics of the site, and relationship with the surrounding area, the site is considered unsuitable for new residential development. The site has no real sense of place, limited outlook and little attraction as a living environment. The character of the area comprises garaging and parking to the rear of Victorian terraced housing.
The design and appearance has not been considered in great detail because the loss of industrial premises and suitability for residential development weigh against the principle of the proposed development. However, although the proposed design has an ‘industrial’ feel, which is not inconsistent with the current use of the site, it results in a bulky building with marked horizontal emphasis, which does not reflect the predominant character of the conservation area surroundings. Indeed, by virtue of the design, proportions and chosen palate of materials, one substantial element of the building at first floor level resembles a utilitarian timber shed. The assessment, therefore, is that the proposed design does not conserve or enhance the character and appearance of the Conservation Area and the application is considered contrary to Policy DBE7.

Amenity space is limited. The proposed properties would have a small courtyard some 3.5-4m wide between the boundary wall and west of the dwellings, and smaller first floor roof terrace. To provide some outlook the houses indicated have living accommodation on the upper floor. The west facing roof terrace overlooks the rear gardens of La Gibauderie, albeit the least sensitive area of gardens and 9m distant at the closest point. The east elevation (towards the existing terraced dwellings) are designed as high level windows (1875mm above floor level) to overcome potential overlooking.

Whilst the proposed residential development may have some effects on adjoining properties, the height is not so high as to cause any significant overshadowing.

Access to the site would remain as existing. Use by four additional domestic vehicles should not raise any significant issues, particularly given the authorised use of the site. Construction access would only be for a limited duration, and it would be expected that any damage would be made good. It is noted from the response of the Parish Constables that it would not be possible to access these properties with a refuse compactor truck, therefore refuse and recyclates would have to be brought to Rouge Huis Avenue for collection.

In conclusion, it is recommended that this application is rejected. It would result in the loss of existing industrial accommodation, contrary to Urban Area Plan policy EMP9 and the site is not suitable for residential use, in terms of policy HO2. The development would also fail to conserve or enhance the character and appearance of the Conservation Area and the application is considered contrary to Policy DBE7.

Date: 28/05/2014