

Ref: 03/11

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08/09/2011

Development Management Unit
Development Services
Abbotsford House
David's Loan
Bainsford
Falkirk

Dear Sir,

05/0924/OUT and AP/11/001/REV_DD.

CHANGE OF USE OF TIMBER YARD TO RESIDENTIAL LAND FOR THE ERECTION OF 36 DWELLINGHOUSES. Land to the East of Jupiter Wildlife Park, Wood Street, Grangemouth.

I refer to your letter of 24th August 2011 concerning the above.

Please find Review Statement of Representations submitted on behalf of CalaChem Fine Chemicals Limited.

I should be obliged if you would acknowledge receipt of this initial statement and advise as to progress on the Review in which CalaChem wish to participate fully.

Please note that this is an initial statement of representations (as information is still awaited from Falkirk Council) and the right is reserved to expand upon it (should it become necessary) in due course.

Thank you for your assistance in this matter.

Yours faithfully

Bryan Wallace

**Director
Wallace Planning Limited.**

Cc D Edwards CalaChem Fine Chemicals Limited.

Contents:

1 Introduction.

2 CalaChem Fine Chemicals Limited.

3 The Development Plan.

4 Material Considerations and Observations upon Notice of Review.

5 Conclusions.

05/0924/OUT.AP/11/001/REV_DD.

CalaChem Representations.

September 2011.

reference: Document2

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1 INTRODUCTION.

- 1.1 These Representations have been lodged on behalf of CalaChem Fine Chemicals Limited. They relate to a proposed development by Carronvale Homes for the erection of 36 dwellings at Wood Street, Grangemouth. Reference 05/0924/OUT. Review by Falkirk Council AP/11/001/REV_DD. CalaChem welcomes the opportunity to maintain and expand upon the previous long-standing and consistent objections raised by its processor companies (KemFine, Avecia and Zeneca) to similar proposals over many years. 05/0924/OUT was originally submitted and has been continued since October 2005 following the refusal of an identical application earlier that year (OPA F/2005/0082) after a site inspection.
- 1.2 CalaChem objects to this proposal on the grounds that it does not accord with the Development Plan and that material considerations including: the Report of the Local Plan Inquiry Reporter; the Seveso II Directive; the views of the Health and Safety Executive; the impact of the proposed development upon CalaChem; high unemployment rates and the economic downturn as well as previous planning appeal/applications refusals all indicate that the decision of Falkirk Council to refuse this application should be upheld.
- 1.3 CalaChem supports the five reasons for refusal set out by Falkirk Council in its decision letter as follows:
- "1. The proposal is considered contrary to the Falkirk Council Local Plan Economic Development-Proposals and Opportunities-ED.GRA09 Wood Street- in that the application site is allocated to support Business/Industrial development.*
- 2. The proposal is considered contrary to the Falkirk Council Local Plan policy Sc2-Windfall Housing Development within the Urban/Village Limit- in that the site is not considered and should be actively retained for Business/Industrial development.*
- 3. The proposal is considered contrary to Falkirk Council Local Plan policy EP2-Land for Business and Industrial Use-in that the site is identified to maintain the business and industrial land supply and the introduction of residential development would erode such provision.*
- 4. The proposal is considered contrary to Falkirk Council Local Plan policy EP18- Major Hazards – in that the Health and Safety Executive have "Advised Against" the proposal based on unit numbers and proximity to major hazards.*
- 5. The proposal is considered contrary to Falkirk Council Structure Plan policy ECON.3-Local Business Development Opportunities-In that the site is allocated within the Falkirk Council Local Plan for Business/Industrial use and the loss of the site to residential will erode such provision."*
- 1.4 CalaChem's (KemFine UK Limited's) original objections to 05/0924/OUT were lodged in 2005 and the basic principles of the objections are testimony to a well established planning policy consistently maintained by Falkirk Council.
- 1.5 These objections are based on the four reasons for refusal of F/2005/0082 for an identical development on the same site.

- 1.6 CalaChem's (Avecia's) objections to F/2205/0082 were :
1. The application may restrict the adjacent petrochemical business in terms of expansion and redevelopment;
 2. Is contrary to Development Plan Policies, specifically those relating to introducing individuals into a major hazard consultation zone;
 3. Is contrary to the emerging Local Plan;
 4. An extensive planning history supports a refusal;
 5. Will site dwellings even closer to the CalaChem Plant; and
 6. The possibility of job losses is not accepted.
- 1.7 Members and officials will know that this is a long-running saga. Indeed Mr Alastair Bell (who is now Carronvale's planning consultant) prepared a Committee Report in 20th March 1997 for a meeting of the Strategic Services Committee on 17th April 1997. In the report Mr Bell himself recommended that development north of Wood Street should be refused! The reasons he gave for refusal all those ago still apply and these are:
1. Contrary to Proposal I6 in the adopted Grangemouth Local Plan identifying the application site to the north of Wood Street as General Industry;
 2. Contrary to POL Grangemouth 7 which seeks to prevent a significant increase in the number of people exposed to the existing risks in the area; and
 3. Could prejudice the chemical industry.
- 1.8 You can see that Falkirk Council as the Planning Authority has maintained a consistent and coherent approach rejecting Carronvale's attempts to build housing on the site. This is maintained in the only recently adopted Falkirk Local Plan.
- 1.9 The position in respect of the Review Application is that the HSE, the Director of Development Services; the applicant's own planning consultant and Wallace Planning Limited all have recommended refusal here on sound planning grounds.
- 1.10 The site of the Review Application extends northwards up to the very boundary of CalaChem's Inner Zone. If approved it will bring housing significantly closer to the chemical complex than the existing strip of housing on the north side of Wood Street. It will open up the entire area for housing purposes as the configuration of the Review site is such that there is a substantial area of vacant land lying between it and Beancross Road which is also in the company's ownership. Carronvale's suggestion to reduce dwelling numbers to 30 only is a cynical "salami" slicing attempt to satisfy HSE yet still ultimately promote the entire Carronvale area north of Wood Street for housing which is contrary to PADHI and the strictures of Seveso II.

- 7
- 1.11 The housing in the Review Application is not compatible with existing and proposed industrial uses on the site. It also creates uncertainty as to how the remainder of the site will be developed. It also conflicts with the employment land allocation.
- 1.12 CalaChem requests that the Review Application be dismissed for the following reasons as well:
- REASON FOR REFUSAL 6: The proposal is incompatible with existing industrial uses.
- REASON FOR REFUSAL 7: The proposal is prejudicial to the proper and comprehensive use of land lying to the north of Wood Street, Grangemouth for employment purposes.
- REASON FOR REFUSAL 8: It is contrary to Falkirk Structure Plan Policy ECON.1 Strategic Development Opportunities which promotes Strategic Economic Development Opportunities such as CalaChem's site and the Grangemouth Chemical Cluster. Note Table 5.1 Strategic Development Opportunities Page 52 of the Falkirk Council Local Plan in order to conform to the Structure Plan lists **Existing Chemical / Petrochemical Sites as Strategic Development Opportunities.**
- REASON FOR REFUSAL 9: It is contrary to Falkirk Structure Plan Policy COM.2 Implementation of Housing Land Requirement (per the Report of the Local Plan Inquiry Reporter) as the proposal is incompatible in terms of housing/petrochemical, chemical industrial uses as well as taking proper account of the location of industrial premises. Note Item 7 of SP Policy COM.2 states that Local Plans will: *"take into account the location and firm development proposals of business and industrial premises including chemical and petrochemical facilities."*
- 1.13 These four reasons for refusal should be added to the existing five.
- 1.14 Please note that these are an initial statement of representations as further details of the application have been requested from Falkirk Council and are still awaited.

2 CALACHEM, GRANGEMOUTH. COMPANY ACTIVITIES AND ECONOMIC SIGNIFICANCE.

- 2.1 CalaChem is a leading international fine chemicals company with clients across the agrochemicals, pharmaceutical and chemical sectors. It was previously known as KemFine UK Limited and was renamed CalaChem Limited following its acquisition by Aurelius in November 2010. In addition to developing and manufacturing fine chemicals, the company provides services to a range of other companies which form part of the Grangemouth chemical cluster, ranging from electricity and steam supply to wastewater treatment.
- 2.2 The Head of Chemical Services for Scottish Enterprise stated that: *"AURELIUS's decision to invest says much for Scotland as a competitive location in which to do business, coupled with a high quality and skilled workforce. Not only did Scottish Development International work very closely with both businesses, but they also co-ordinated a seamless "Team Scotland Approach" involving Scottish Enterprise, the Scottish Government, Falkirk Council and Transport Scotland which has resulted in the successful outcome."*

- 2.3 Since its establishment in 1919 the chemical plant at Grangemouth has developed the necessary equipment; infrastructure and skills to compete in the international market of fine chemicals. The chemicals industry is a competitive highly skilled; capital intensive industry. CalaChem Grangemouth has an enviable training record; employs one of the highest concentrations of scientific and engineering graduates in Scotland and maintains a substantial investment programme. Over 90% of the site's manufacture is exported. The Grangemouth site has been specially developed over a period of many years to cater for the specialised manufacture of fine chemicals. It represents a unique resource in the national interest and forms an important part of the Grangemouth chemical cluster which also includes Fujifilm and Syngenta who are dependent upon the support services that CalaChem provides.
- 2.4 CalaChem's plant employs some 160 persons with additional contract employees. It is estimated that for every 1 CalaChem employee, 2 additional employees are supported elsewhere in the local Forth Valley economy (a further 320 jobs approximately elsewhere). This is a combined total of some 480 jobs. If we add to this figure of 1.7 additional immediate family members per family (say 816 dependent family members) it is estimated that there are some 1300 people dependent upon CalaChem's current plant at Grangemouth.
- 2.5 The recent acquisition by Aurelius represents a significant and very welcome investment in Falkirk and Scotland. The company has significant plans for further investment and does not accept that its future should be jeopardised by the potential establishment of a housing development contrary to all planning policies so close to its operations.
- 2.6 Two new investment projects have been sanctioned by Aurelius. One is on the North Site and the other is in the L2 Plant adjacent to Plot 13 in Earls Gate Park 1 on the South Site. There are two further investments expected to be sanctioned in L2 Plant in 2012 and followed potentially by one in the L3 Plant which is situated to the North West of L2.
- 2.7 CalaChem's objections derive from the fact that the presence of further housing would lead to objections from future residents and that it is inappropriate to permit this scale of new housing in a Middle Zone. This would compromise existing operations at the plant and jeopardise future investment. Compatibility problems would arise from noise; visual impact; lighting; other forms of pollution and Health and Safety issues. Future planning and hazardous substances consent applications would be prejudiced.
- 2.8 The Grangemouth chemical cluster employs some 900 people which is equivalent to some 7,300 people dependent upon the chemicals industry.
- 2.9 Over a period of many years CalaChem and its predecessors has developed an inward investment strategy with the support of Falkirk Council; Scottish Enterprise Forth Valley; Scottish Enterprise and Scottish Development International. This support recognises that the chemicals industry is a key growth area in the economy and the significance of CalaChem in this respect. The Company is promoting a marketing campaign designed to attract additional inward investment. It is believed that there is a strong case to attract new companies and joint ventures to the Grangemouth site which will benefit the local economy; create further employment and bring additional capital investment to the area. This is demonstrated by the successful fully let Earls Gate Park 1 initiative and the proposed Earls Gate Park 2.

- 2.10 CalaChem's strategy is designed to develop and attract new and profitable CalaChem's and 3rd party businesses which will create new employment and contribute to the safeguarding of existing employment by contributing to the on-going fixed overhead costs of the plant.

3 DEVELOPMENT PLAN.

- 3.1 Scottish Planning Policy states that: "The Town and Country Planning (Scotland) Act requires decisions to be made in accordance with the development plan unless material considerations indicate otherwise."
- 3.2 The Development Plan comprises the Falkirk Council Structure Plan 2007 and the Falkirk Council Local Plan 2010.

Structure Plan.

- 3.3 Section 3 Economic Prosperity states that the area has a number of sectoral strengths, notably the nationally important chemicals sector in Grangemouth which **must** be built upon.
- 3.4 Paragraph 3.15 Page 21 reads: "Finally, Grangemouth continues to offer strategic opportunities for the development of the chemical and petrochemical industries. Opportunities exist within the land holdings of existing companies---."
- 3.5 ECON 1. Strategic Development Opportunities promotes Strategic Economic Development Opportunities such as CalaChem's site and the Grangemouth Chemical Cluster.
- 3.6 ECON 3. provides for Local Development Business Opportunities in that the Review site is allocated in the Local Plan for Business/Industrial Use.
- 3.7 Policy COM2 states that: "In implementing the housing land requirement set out in Schedule COM1a, Local Plans will:
- 7 take into account the location and firm development proposals of business and industrial premises including chemical and petrochemical facilities."*
- 3.8 The proposal is contrary to the Structure Plan in that it proposes a sensitive land-use namely residential within CalaChem's Middle Zone which is objected to by the Health and Safety Executive. Furthermore the Review Application site adjoins the boundary of CalaChem's Inner Zone and its north-south configuration will promote the remaining large area within the Carronvale ownership for further housing development.
- 3.9 CalaChem is a major employer who has major plans for substantial development within its site boundaries. This proposed development and existing activities will be put at risk by the Review proposal.
- 3.10 The Report of Survey contains the background information underpinning the policies in the Structure Plan. It refers to the Seveso II Directive which requires member states to introduce measures that will prevent major accidents involving hazardous substances and limiting their consequences for man and the environment. It also states that Grangemouth has the largest concentration of chemical complexes in

Scotland and one of the biggest in Britain. The sites and installations are subject to strict controls but it is considered prudent to also control the kinds of development permitted in the vicinity of these installations.

- 3.11 The Report of Survey goes onto state that much of Grangemouth is affected and this can be a significant constraint particularly to development proposals that may increase the number of people exposed to potential hazards. This section of the Report of Survey is directly applicable to the Wood Street proposal which would significantly increase the number of people exposed to potential hazards. This view is shared by the Health and Safety Executive.

Local Plan.

- 3.12 This is a recently adopted (December 2010) Table 5.1 Strategic Development Opportunities lists Existing Chemical/Petrochemical Sites including the CalaChem site as one of nine strategic locations for major economic development within the Council area. It is a site of economic importance which should be protected from non-conforming developments in its vicinity.
- 3.13 The Review Application site is allocated as ED.GRA09 Wood Street to support Business/Industrial Development. EP2 also applies in that the site is identified to maintain the business and industrial land supply.
- 3.14 Paragraph 5.55 states that: "*The chemical companies in Grangemouth are of major economic importance in both a Scottish and a local context and are recognised as such in National Planning Framework 2.*"
- 3.15 Protection to the CalaChem site from inappropriate development such as Carronvale's is provided by EP MAJOR HAZARDS (3) which refers to the potential impact that proposals may have upon chemical and petrochemical establishments. Furthermore the Health and Safety Executive has "Advised Against" the proposal under this Policy.
- 3.16 The proposal is also contrary to SC2 Windfall Housing Development within the Urban/Village Limit in that the site is not considered brownfield. It should be actively retained for Business/Industrial development rather than the long-term strategy and actions of Carronvale to promote it as a housing site. The consequences of Carronvale's actions if successful are that this would provide a template for other owners and "all" employment land in Falkirk would be promoted for housing purposes using this as a precedent.
- 3.17 Clearly the proposed development is totally contrary to the recently Adopted Local Plan.

Report of the Local Plan Inquiry Reporter

- 3.18 The findings of the Local Plan Inquiry Reporter are briefly summarised below. They should be treated as a material consideration but for ease of reference are included here.
- 3.19 Paragraph 2.24 Page 204 of the Report dismisses a Local Plan objection by Carronvale Homes for a housing allocation on this site. It reads: "*Our main concern relates to a different aspect. We do not consider housing and this type of industrial use to be entirely compatible. The allocation would take*

housing closer to the petrochemical/chemical works. It would add to the housing already in the area and proposed in the FCLP, including housing proposed in the middle zones. It could also lead to pressure for housing on other nearby sites in similar locations. We would expect residents to be wary of future development proposals at the petrochemical/chemical work. While technological improvements may reduce the conflict between the 2 uses, it is difficult to predict the precise nature and effect of evolving chemical processes, and we consider that there is still likely to be at least some scope for long term conflict. Our concern is that a housing allocation on the objection site could act as an unnecessary further constraint on industrial operations which are of importance. Although we acknowledge the issue with the housing land supply and the consequent attractions in allocating the objection site for housing, we are not persuaded that this should be done without a proper assessment of other options in the area, and a conclusion that this is the best alternative. In the circumstances, and at this stage, we do not consider a housing allocation to be appropriate, and we believe that it would be best if, for the time being, the site remained as a business/industrial opportunity."

- 3.20 The Reporter was concerned at a housing allocation on the objection site and could not allocate the site for housing without a proper assessment of other options in the area. NO SUCH ASSESSMENT HAS BEEN CARRIED OUT. The Reporter made it clear that he could not accept that housing should come any closer to an existing multimillion £ chemical complex operating in the national economic interest. This has been the situation for many years and remains so today.
- 3.21 In respect of Policy SC1- Housing Land Provision the Reporter concluded that there was sufficient housing land available in all but 2 areas of the Local Plan namely Grangemouth and Polmont once the new proposed allocations have been taken into account.
- 3.22 In respect of Grangemouth he accepted; *"that there are significant health and safety constraints which require to be taken into account in considering further allocations"*. He recommended new housing sites to increase the housing land supply but none in Grangemouth. Thus acknowledging that there is a case on health and safety grounds for not allocating the full housing land requirement in Grangemouth.
- 3.23 The Reporter considered a request from CalaChem and other chemical cluster industries that a new criterion be added to Policy EP18- Major Hazards. This was to cover the potential impact that new developments may have upon established chemical and petro-chemical companies and the interaction between hazardous installations/sensitive land uses eg residential.
- 3.24 He accepted:" that an additional criterion along the lines proposed would be reasonable as it would formally recognise in Policy EP18 the importance of these industries and make explicit that the effects of development proposals on them would be assessed and balanced against the other criteria. The additional criterion in the policy need only refer to the effects that a development proposal would have on chemical and petro-chemical establishments. It is unnecessary to go any further."

4 MATERIAL CONSIDERATIONS AND OBSERVATIONS UPON NOTICE OF REVIEW.

- 4.1 The Town and Country Planning (Scotland) Act 1997 requires decisions to be made in accordance with the development plan unless material considerations indicate otherwise. Material considerations should be related to the development and use of land.
- 4.2 The proposal at Review is totally contrary to the Development Plan including the recently adopted Local Plan. The appellant has failed to identify any material considerations to outweigh the Development Plan. The appellant is also unaware of material considerations which further support the original decision to refuse planning consent some of which are listed below.
1. Impact upon the established CalaChem chemical company which is of acknowledged national economic interest both in its own right and as part of the Grangemouth chemical cluster;
 2. The Report of the Local Plan Inquiry Reporter's Report and in particular the statement therein that:
"We do not consider housing and this type of industrial use to be entirely compatible. The allocation would take housing closer to the petrochemical/chemical works. It would add to the housing already in the area and proposed in the FCLP, including housing proposed in the middle zones. It could also lead to pressure for housing on other nearby sites in similar locations. We would expect residents to be wary of future development proposals at the petrochemical/chemical works. While technological improvements may reduce the conflict between the 2 uses, it is difficult to predict the precise nature and effects of evolving chemical processes, and we consider that there is still likely to be at least some scope for long term conflict. Our concern is that a housing allocation on the objection site could act as an unnecessary further constraint on industrial operations which are of importance."
 3. Unemployment Rates –see below;
 4. The Seveso II Directive (96/82/EC) on the control of major accident hazards involving dangerous substances requires member states to take steps in their land use policies to meet the objectives of preventing major accidents and limiting their consequences. The proposal raises fundamental questions concerning the application of European law to domestic planning policies.
 5. The Health and Safety Executive has advised against the granting of planning permission for health and safety reasons.
 6. Previous Planning History:
 - a) In June 1999 an appeal by Carronvale Homes for 167 houses and 66 flats on land including the Review site was dismissed by a Senior Executive Inquiry Reporter's Unit. The Reporter concluded that the appeal proposal offended the Development Plan, and that material considerations did not justify exceptional approval;
 - b) Planning Consent was granted by Falkirk Council for the erection of 60 dwellings in a ribbon development along the northern boundary of Wood Street, Grangemouth. However this consent has lapsed through time and is no longer valid or relevant ;

- c) F/2002/0622 was refused by Falkirk Council in 2003 for the erection of dwellings on this land;
- d) F/2005/0082 was refused by Falkirk Council in 2005 for the erection of dwellings on this land; and
- e) On 11th September 2007, Lord Clarke sitting in the Court of Session issued his judgement in a petition by Eriden Properties for Judicial Review of a grant by Falkirk Council of a Hazardous Substances consent to KemFine UK at Grangemouth (2007 SLT 966).

Lord Clarke rejected the petitioner's case. In his view the fact that the site had operated as an important part of the petrochemical industry for some years was a highly relevant consideration. It was not, as a matter of fact, a new installation. Different considerations might have applied in relation to a new installation but the application applied to a successfully established operation for which there was planning permission, which had played a part in the economic life of the area for some considerable time and in respect of which there had been previous consents. These were "important features" of what was before the Council.

It is significant that Lord Clarke in his judgement recognised the long-established economic worth of the CalaChem (KemFine) site.

Comments Upon Carronvale's Reasons for Review:

- 4.3 Para 2. Page 1. None of the Carronvale land was shown for sale on any of the following web sites on 3rd September 2011:

- 1. Carronvale's own web site.
- 2. Falkirk Council's Business Property Register;
- 3. DM Hall and
- 4. Gerald Eve.

There is no evidence that Carronvale has carried out a sustained marketing campaign to justify its claim.

- 4.4 A site inspection of the Carronvale, Wood Street site was carried out on 7th September 2011 which found no evidence of "industrial land for sale" signs on the Carronvale site boundary fences facing either Beancross Road or Wood Street. There is however, plenty of signage relating to the "Eclipse" housing development and their builders merchant business on the fencing on both roads. Thus implying that the land in question is being advertised for housing from the boards particularly on Beancross Road.
- 4.5 The near by take up in Earls Gate Park 1, Timber Components in the former Jupiter Building, the Whyte and MacKay Bottling Plant demonstrates that demand exists for business land in this area.
- 4.6 The Reporter considered just over a year ago that the site should remain as a business/industrial opportunity. Since that time:

1. there have been major investments by Aurelius;
 2. the UK Chemical Industry is facing increased global competition; and
 3. there has been a 90.4% increase in the number of Job Seekers Allowance claimants between July 2006 to July 2011 in the Constituency of Falkirk. Source: Page 20 House of Commons Library Research Paper 11/60 17th August 2011.
- 4.7 These are sound reasons why employment land should not be lost and a major chemical plant put at risk.
- 4.8 The Local Plan Inquiry Reporter accepted that special circumstances of the Forth, flood risk Green Belt and the presence of hazardous installations restrict the provision of housing land in Grangemouth. Circumstances that do not exist nearby in other parts of Falkirk where substantial development has more properly taken place. An aging population and falling occupancy rates has led to a population decline. The reversal of a population loss of nearly 7,700 alone would require the construction of say 3,500 houses which clearly is not possible.
- 4.9 Housing sites are being released in Grangemouth subject to the constraints of Forth, flood risk. Green Belt and hazardous installations which is entirely sensible. The priority should be to support the jobs provided by the internationally competitive and the jobs that go with it to support services and the house-building industry.
- 4.10 It is scaremongering to suggest that Carronvale cannot use other land for relocation purposes. It cannot be classed as brownfield as it is not vacant. The area proposed for the 36 houses is entirely different from the previously consented site which adjoined the north side of Wood Street. This is time lapsed and is no longer valid. The original area bordered closely to Wood Street running in an east-west direction whereas the Review Application runs north-south extending from Wood Street as far as the Jupiter Wildlife Park and the inner zone boundary.
- 4.11 The suggestion to reduce the number of houses is a cynical attempt by salami slicing to avoid an HSE refusal. This still leaves the remainder of the Carronvale land north of Wood Street which no doubt would be subject to successive applications to build 30 houses each time which would be contrary to the Seveso II Directive and long-established planning policy.

5 CONCLUSIONS.

- 5.1 This is the latest in one of many attempts to build housing on the Carronvale land north of Wood Street, Grangemouth.
- 5.2 It is totally contrary to the Structure Plan and the Falkirk Local Plan which was only adopted on December 8th 2001 less than a year ago. Both Plans seek to maintain the long-established, nationally significant Grangemouth chemical sites as Strategic Development Opportunities and protect the public from risk. The Review site is zoned for employment use.
- 5.3 The Health and Safety Executive, the Director of Development Services, Wallace Planning Limited and indeed Carronvale's own Planning Consultant have all rejected housing development on this site.
- 5.4 Less than a year ago Aurelius made a multimillion pound investment to safeguard the CalaChem plant with further investments scheduled also.
- 5.5 An independent Local Plan Inquiry Reporter has recently expressed concern that a housing allocation on the objection site could act as an unnecessary further constraint on industrial operations which are of importance. He also confirmed that:
- The chemical cluster should be recognised as a Strategic Development Opportunity;
 - Further housing allocations in Grangemouth must recognise health and safety considerations;
 - Changed EP18- Major Hazards to recognise the importance of the chemical companies and the impact that development proposals in the surrounding area may have upon them;
 - Recognised that even if acceptable from a HSE point of view- Housing and Chemicals are not compatible; and
 - Recognised that Housing at Wood Street is inconsistent with Structure Plan Policy COM2.
- 5.6 The Review should be dismissed.