

FAO Alan Graham

Planning Department Glasgow City Council 82 George Square Glasgow G2 1DU

Our Ref: P19-013

Date: 23/04/2021

Dear Sir/Madam,

APPLICATION FOR PLANNING PERMISSION FOR FORMATION OF CAR PARK (ON EXISTING HARDSTANDING) AND ASSOCIATED WORKS AT LAND NORTH OF THE APPROVED NEW EDMISTON HOUSE, IBROX, G51 2YX ePlanning Reference: 100387719

On behalf of our client Rangers Football Club, Keppie Design today submit an application for Planning Permission for formation of a car park and associated works at land immediately north of Edmiston House, Ibrox, G51 2YX.

In support of the application, the following pack of plans and reports have been submitted today via e-planning:

Plans:

- Location Plan [KEP-XX-XX-DR-A-5020-0001] Prepared by Keppie Design
- Existing Car Parking Layout [KEP-XX-XX-DR-A-5020-0101] Prepared by Keppie Design
- Proposed Car Parking Layout [KEP-XX-XX-DR-A-5020-0102] Prepared by Keppie Design
- Tracking plan Prepared by Woolgar Hunter

Accompanying documents:

- Application Forms Prepared by Keppie Design
- This planning justification letter Prepared by Keppie Design
- Drainage Impact Assessment (For information purposes and as submitted with New Edmiston House Planning Application (20/02170/FUL))

Application Fee

The application is for the construction of a car park and therefore falls under Category 7 (c) 'the construction of car parks, service roads and other means of access on land used for the purposes of a single undertaking, where the development is required for a purpose incidental to the existing use of the land.' of the Town and Country Planning (Fees for Applications and Deemed Applications) (Scotland) Regulations 2017. As such, an application fee of £202 is due alongside an advertisement fee of £125. A total of £327 will therefore be paid at the same time as this application is submitted.



The Site

The site is located to the immediate east of Ibrox Stadium, approximately 2.5km to the south west of Glasgow City Centre, on the south side of the River Clyde. The application site boundary covers approximately 0.5ha and includes the site of the former Edmiston House and area of existing hardstanding parking to its immediate north. This area historically has comprised **95no.** parking spaces as illustrated by the accompanying existing site plan. It should be noted that the larger site boundary is to allow flexibility in delivering the scheme and that the actual area of 'development' will only comprise 0.2ha.

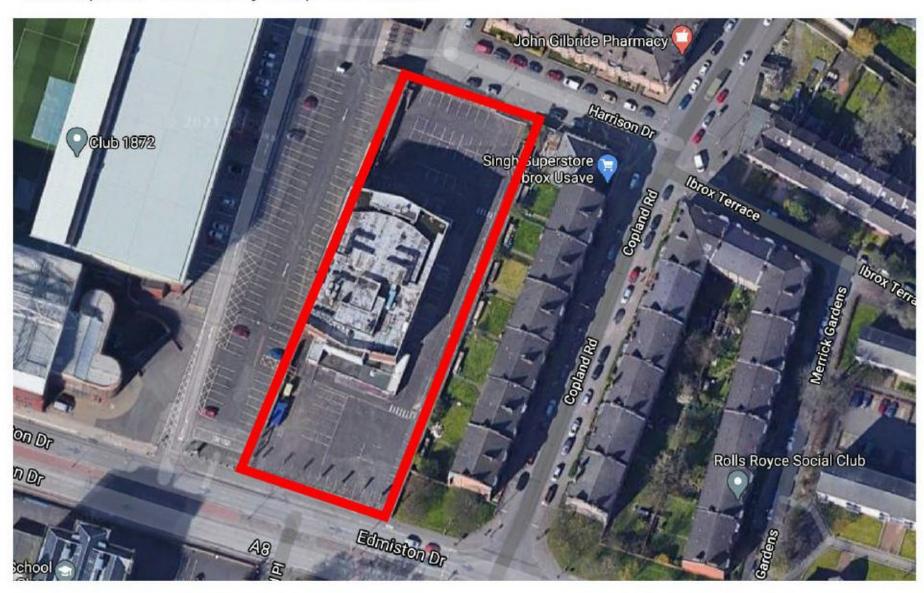


Figure 1: Approximate Site Boundary Edged Red

Harrison Drive borders the northern extent of the site and to the west is the western stand of Ibrox Stadium. To the south, the site abuts Edmiston Drive, to the east the rear face of a row of 4-storey tenement buildings looks onto the site with associated garden areas.

Access is taken from Harrison Drive, which is the current entrance to the existing hardstanding car park.

There are no Listed Buildings within the Site; however, the Ibrox Stadium to the immediate west is a category B listed structure. There are further category B listed residential buildings to the north east of the site along Ibrox Terrace. These are neither visible from the site, nor do they have any direct views of the site.



There are no notable environmental designations within the site or nearby vicinity and a search of SEPA flood risk maps indicates no on-site flooding issues as illustrated by Figure 2 below.



Figure 2:Excerpt of SEPA Flood Map (Site edged red)

Parking Context

The context for this application is a wider review and re-organisation of car parking associated with Ibrox Stadium and Rangers Football Club operations. Principally, a proposed residential development at land encompassing the Albion Car Park, to the south west of Ibrox Stadium, requires an amendment to a Planning Obligation (attached to 89/03823/DC) which requires Rangers FC to provide 900no. parking spaces on that site. An application to modify this Planning Obligation (20/03297/MPO) has been submitted seeking to re-distribute these spaces by introducing parking to existing areas of accessible hardstanding around Ibrox Stadium.

The existing hardstanding car park to the north of the former Edmiston House, which was not previously under the control of Rangers FC but now is, has now been identified as an area which can contribute parking spaces toward meeting the obligation. This area has historically been used as parking for Rangers staff on non-match-days and match-day parking.

This application has therefore been requested by Glasgow City Council to formalise this area of parking and allow its inclusion within a modified legal obligation.

Proposals

Early discussions were held with Council Officers to discuss the context and delivery of the new formalised parking area. The majority of the land to which this application relates was previously in use as a car park, with access taken from Harrison Drive.



The new proposals maintain the Harrison Drive access and will provide <u>93no.</u> formalised parking spaces. These new spaces will provide a similar, albeit reconfigured, parking arrangement to the existing parking area with spaces available for patrons of New Edmiston House on non-match-days and match-day parking. Servicing access to the New Edmiston House will also be accommodated along the eastern boundary of the new layout. Given the nature of the car park's use and timing of servicing activities (outside of match-day events), it is not anticipated that there will be any conflict between servicing vehicles and the car park's use.

The intended layout of the scheme is shown below and comprises aisled spaces which meet standard dimensions ($5m \times 2.5m$) and provide aisle widths of 6m. It should be noted that the proposals do not alter site levels, nor significantly change the nature of the site as an existing area of hardstanding car parking. The development is ultimately to formalise, extend, and improve existing vehicle parking at the site.



Figure 3: Proposed Parking Layout

It was confirmed with Council Officers that there is no requirement to provide disabled access spaces within this area given the unsuitable levels and dedicated areas of accessible parking available elsewhere on Rangers FC grounds. Similarly, it was confirmed that there is no requirement for either active or passive Electric Vehicle charging spaces in this location.

As noted, the Harrison Drive access will be utilised by delivery vehicles servicing the new Edmiston House (as per the extant planning consent: 20/02170/FUL). Consideration has been afforded to how these two functions will interact, and a tracking analysis has confirmed that the layout and aisle widths will allow servicing vehicles to pass parked and moving vehicles, as well as entering and exiting the site in a forward gear.

Drainage arrangements of the formalised parking area were also discussed with Council Officers prior to making this application. The Drainage Impact Assessment submitted



alongside the application for the New Edmiston House (20/02170/FUL) has been provided for information purposes, and is accompanied by the following clarifications from the engineers involved in preparing that report that:

- The existing drainage network for the hardstanding car park area is not altered by the new Edmiston House drainage network.
- An abandoned sewer line connecting to the 'existing' Edmiston House does not change the drainage arrangement for the hardstanding car parking area.
- The northern hardstanding car parking area drains to one or both combined sewers shown on the Scottish Water asset plan via existing gullies. That plan is appended to the accompanying DIA. This arrangement is existing and considered appropriate.
- The New Edmiston House drainage network encompasses the area to the northern extremity of the existing Edmiston house, and includes attenuation which will reduce discharge flow rates to the SW network as agreed with Scottish Water. This will result in a betterment to the drainage arrangement across the Edmiston House site.

Given that the wider site was previously majority hardstanding and roof surface, associated with the former Edmiston House, it is considered that the proposed formalised car park will drain in the same way as the existing hardstanding car park and that no further interventions are therefore required.

Policy Position

In accordance with the provisions of Section 25 and 37(2) of the Town and Country Planning (Scotland) Act 1997, as amended, this application must be determined in accordance with the development plan, unless material considerations indicate otherwise.

The development plan for the site comprises the Clydeplan Strategic Development Plan (SDP) (2017) and Glasgow's City Development Plan (2017). The following sets out the relevant policy tests and provides a response as to how the proposals comply with these.

Clyde Plan (2017)

An assessment against the policies of the Strategic Development Plan (SDP) is required for development which is of a scale likely to impact upon the SDP vision. Such development is indicated within Schedule 14 and requires assessment in-line with Diagram 10.

An initial assessment against Clydeplan 'Diagram 10' indicates that the proposals raise no issues of a strategic nature, and as such they should primarily be assessed against the relevant policies of the adopted Glasgow City Development Plan.

Glasgow City Development Plan (2017)

The Glasgow City Development Plan was adopted in March 2017, and along with associated supplementary guidance sets out the vision and strategy for land use whilst also providing the basis for assessing planning applications.



The following key Policies and Supplementary Guidance are deemed applicable to the assessment of the proposals.

<u>Placemaking</u>

Policy CDP 1 The Placemaking Principle - states that: 'In order to be successful, new development should aspire to achieve the six qualities of place as defined in draft Scottish Planning Policy, and reinforced by Creating Places and Designing Streets.'

Policy CDP 2 Sustainable Spatial Strategy - states that: 'The Council will focus on the regeneration and redevelopment of existing urban area'

Response:

It is considered that the proposed development will not substantively alter the character or appearance of the application site nor its wider context. It is supportive of the wider regeneration ambitions and will be completed to a high design standard, improving the environment within which it is situated. The proposals are therefore considered to accord with Policies CDP 1 and 2. It is also noted that the site is within an area identified as H125 'East Govan/ Ibrox – Transformational Regeneration Area' (TRA). It is noted that this is an area which focuses on housing-led regeneration and that a masterplan for its comprehensive development has yet to come forward. The proposals subject to this application are not considered to conflict with the overarching ambition of the TRA, and through improvement to the built environment should be considered consistent with its aims.

Drainage and Flood Risk Policy

Policy CDP 8 Water Environment - states that it should be demonstrated how proposals contribute to

- 'minimising and reducing flood risk;'
- 'avoiding any increased risk of flooding from any source either within the development site, or out with the site as a consequence of the development; and'
- 'avoiding any increase in the quantity and rate of surface water run-off from any site'

SG8: Water Environment

SG8 notes that a Surface Water Drainage Strategy (SWDS) will be required for:

"new development of 5 or more dwellings or introducing a new building of more than 250 sq metres ground floor area."

Response:

A review of SEPA's flood risk maps illustrates that the site is not within an area at risk of flooding. The application is accompanied by a Drainage Impact Assessment which was prepared for the development of the new Edmiston House to the immediate south of the area of proposed hardstanding parking as well as the clarifications set out within this note that given that the proposals will not increase the level of hardstanding at the site (which was previously hard surface car parking and roof



spaces) there will be no material change to how the site drains. The proposed car park will therefore continue to drain as existing, with two sewer connections on site. It is also confirmed that the drainage network for the new Edmiston House does not adversely impact the drainage arrangements for the area of parking and will in fact be a betterment to drainage on the site as a whole given the introduction of retention systems in that development. The proposals do not include development of any dwellings or introduce any new buildings, as such the guidance indicates that a Surface Water Drainage Strategy is not required.

The proposals are therefore considered to accord with Policy CDP 8 and SG8.

Parking specific policy and supplementary guidance

Policy CDP 11 Sustainable Transport - states that the Council will:

- 'apply restraint-based maximum parking standards to non-residential development;'
- expect parking spaces and charging points for the charging of electric vehicles in larger developments;'

Points 3 to 6 relate to residential or City Centre development and are not considered applicable.

- 7. 'outwith the City Centre, not support proposals for permanent or temporary public parking, intended to serve commuting demand, except where consistent with an approved transport strategy for park and ride;
- 8. support car parking at basement level within buildings, where possible, and not at ground or street level where this would be at the expense of an active frontage onto a public street or space; and
- 9. relates to City Centre development and is not considered applicable.'

And;

'The Council will require new developments to be designed to promote and facilitate walking and cycling, including the provision of cycle parking and direct connections to the walking and cycling network'

SG11: Sustainable Transport: Parking (2017)

The Supplementary Guidance sets out maximum parking standards for new development, and states that 'Parking provision for major developments is determined through the Transport Assessment (see Section 10) where the agreed mode share target (as measured by car drivers) is used to modify the parking provision (within the limits provided by the maximum standards).'

Response:

The area of parking to which this application relates will form part of a total requirement for provision of approx. 900no. standard spaces across the Rangers FC Ibrox site for use by Rangers Stadium patrons and not commuters, with a paid entry system in place at the site to control access. This requirement has previously been assessed and deemed appropriate and in compliance with maximum parking standards. Dialogue with Council Officers has confirmed that given the proposed parking forms



part of a wider parking strategy there is no requirement for provision of disabled access spaces in this location (as sufficient numbers of spaces are provided elsewhere on the site), nor a requirement for provision of passive or active Electric Vehicle parking. Similarly, cycle parking provision is catered for in more appropriate locations across the Ibrox site. The provision of 93no. standard spaces at the proposal site is therefore considered to be consistent with Policy CDP 11 and SG11.

I trust all of the above is in order and as discussed and that it will allow you to process this application accordingly.

Should you require any further information, or wish to discuss any aspect of the application, please do not hesitate to contact me.

Kind regards

Andrew Strachan

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