



OCTOBER
2023

Pre-Application Consultation Report

249 West George Street, Glasgow, G2 4QE

Iceni Projects Limited on behalf of
Courie Investments Ltd

October 2023

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ON BEHALF OF COURIE
INVESTMENTS LTD

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249 WEST GEORGE STREET, GLASGOW, G2 4QE

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1. INTRODUCTION

1.1 This Pre-Application Consultation (PAC) Report has been prepared by Icen Projects Ltd, on behalf of Courie Investments Ltd (“the applicant”) to support an application for Planning Permission for purpose built student accommodation at 249 West George Street, Glasgow (“the site”).

1.2 The full description of the proposed development is as follows:

Demolition of existing building and erection of purpose built student accommodation with associated amenity, access and other ancillary works.

1.3 The proposals constitute “Major” development under the Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009. Therefore, statutory pre-application consultation is required prior to the submission of the application.

1.4 The formal pre-application consultation commenced following the submission of a Proposal of Application Notice (PoAN) to Glasgow City Council on 10th July 2023. The PoAN was allocated the reference number 23/01725/PAN and acceptance from the Council that the PoAN was satisfactory was received on 28th July. A copy of the PoAN can be found in Appendix A1.

1.5 This PAC Report sets out what consultation was undertaken prior to the submission of the planning application, as well as the outcomes of this consultation. The applicant has actively sought and responded to the views of the community throughout the consultation period.

1.6 This PAC Report comprises the following sections:

- Chapter 2: Regulatory Context;
- Chapter 3: Pre-Application Consultation Activities;
- Chapter 4: Analysis of Consultation Feedback;
- Chapter 5: Conclusion;
 - Appendix A1: Proposal of Application Notice;
 - Appendix A2: Newspaper Advert – First Event;
 - Appendix A3: Newspaper Adver – Second Event;
 - Appendix A4: Consultation Boards – First Event;
 - Appendix A5: Consultation Boards – Second Event;
 - Appendix A6: Feedback Received;
 - Appendix A7: Poster Displayed at Venue.

2. REGULATORY CONTEXT

2.1 As outlined under the Planning etc. (Scotland) Act 2006, developments designed as “Major” must comply with the following pre-application consultation procedures outlined within the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, as amended by The Town and Country Planning (Pre-Application Consultation) (Scotland) Amendment Regulations 2021 (“the Regulations”).

- Submission of a Proposal of Application Notice (PoAN) to the relevant planning authority.
- A minimum of 12 weeks must elapse between submitting the PoAN and submitting an application.
- Consulting the community councils whose areas are within or adjoin the application site.
- Host two public events to allow the public to view the proposals and submit comments prior to the submission of an application.
- Advertise the events in a local paper at least 7 days in advance of the statutory events.
- Provide feedback at the final event to members of the public in respect of comments received by the prospective applicant on the proposed development.
- Submit a Pre-Application Consultation (PAC) Report within the resultant planning application, detailing the consultation undertaken and any changes made to the proposal as a result.

2.2 The following chapter explains how the above consultation procedures have been complied with and summarises other consultation activities which were undertaken beyond the statutory requirements, in order to ensure a comprehensive and inclusive planning application submission.

3. PRE-APPLICATION CONSULTATION ACTIVITIES

Compliance with Statutory Requirements

3.1 The following requirements have been met:

- Submission of a Proposal of Application Notice (PoAN) to Glasgow City Council on 10th July 2023 (ref. 23/01725/PAN). The 12-week statutory period has now lapsed, and the subsequent planning application can be submitted.
- Inform the community councils that the application site is either within or adjacent to;
- Host a public consultation event to allow the public to view the proposals; There were to statutory events which took place on 9th August and 5th September 2023.
- The second consultation event allowed the public to view updated proposals and provide feedback on comments received at the previous event;
- Publish, in a local paper (Appendix A2 and A3), a notice containing:
 - A description of, and the location of, the proposed development;
 - Details as to where and how (including by what electronic means) further information may be obtained concerning the proposed development;
 - A statement explaining how, and by when, persons wishing to make comments to the prospective applicant relating to the proposal may do so;
 - A statement that comments made to the prospective are not representations to the planning authority and if the prospective applicant submits an application there will be an opportunity to make representations on the application to the planning authority.

3.2 The Proposal of Application Notice (PoAN) associated with the proposed development was submitted to Glasgow City Council on 10th July 2023 and allocated the reference number 23/01725/PAN. The 12-week consultation period has now lapsed, and the subsequent planning application can now be lodged. This document represents the statutory PAC Report which details the consultation process.

3.3 An advertisement was placed in the Glasgow Evening Times on Friday 28th July and Friday 25th August 2023, at least 7 days in advance of each consultation event. The public notices contained details of the proposal including a description of the proposed development and information relating to the pre-application consultation and details on how to engage. The dedicated project email created for members of the public to provide feedback and obtain further information in respect of the development proposals was also included on each of the newspaper adverts. A copy of the advertisements are contained in Appendix A2 and A3.

Notified Parties

3.4 The parties received a copy of the PoAN sent to Glasgow City Council on 10th July 2023 are outlined in Table 3.1 below. An invite to arrange a video or phone call to discuss the project was also included in email correspondence with stakeholders.

Table 3.1 Statutory PoAN Recipients

Community Councils	Local Ward Councillors	MP/MSPs
Blythswood and Broomielaw Community Council	Eva Bollander	Alison Thewliss MP
	Philip Braat	Kaukab Stewart MSP
	Angus Milar	Pam Duncan-Glancy MSP
	Christy Mearns	Patrick Harvie MSP
		Anas Sarwar MSP
		Annie Wells MSP
		Sandesh Gulhane MSP
		Pauline McNeill MSP
	Paul Sweeny MSP	

Statutory Consultation Arrangements

3.5 In line with Scottish Government guidance, the following arrangements were put in place to facilitate the statutory public consultation:

Event 01 – to allow the public to view the proposals and submit comments prior to the submission of an application.

- An in-person event was held on Wednesday 9th August 2023 between 2pm and 7pm at The Renfield Training and Conference Centre, 260 Bath St, Glasgow G2 4JP.
- An advert for the first consultation event was published in the Glasgow Evening Times on Friday 28th July 2023, at least 7 days in advance of the first statutory consultation event. A copy of the newspaper advert can be found in Appendix A2.
- A deadline for feedback after the first consultation event was set for 30th August 2023. This date was at least 7 days after the consultation event and at least 21 days after the press advert was published.

Event 02 – Provide feedback at the final event to members of the public in respect of comments received by prospective applicant as regards the proposed development.

- A second in-person event was held on 5th September 2023 between 2pm and 7pm at The Renfield Training and Conference Centre, 260 Bath St, Glasgow G2 4JP.
- An advert for the second event was published in the Glasgow Evening Times on Friday 25th August 2023, at least 7 days after the consultation event and at least 7 days in advance of the first statutory consultation event. A copy of the newspaper advert can be found in Appendix A3.
- A further deadline for submitting feedback was set for 26th September 2023, to allow further comments from stakeholders and members of the public to be received.

3.6 The public notices contained details of the proposal including a description of the proposed development and information relating to the pre-application consultation and details of how to engage.

3.7 In addition, the notified parties received emails advising of the submission of the PoAN which included details of the proposed consultation event dates and times.

Public Consultation Events

3.8 The Renfield Training and Conference Centre was chosen to host the public consultation events due to its proximity to the site, the availability of disabled access and it being a busy, public venue. It was hoped that the timing of the event in the afternoon / evening on a weekday would encourage a good cross section of the community to attend.

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- 3.9 Several Members of the project team attended the public consultation events, including representatives from:
- The Applicant – Courie Investments Ltd;
 - Architect – Mosaic Architecture & Design; and
 - Planning Consultant – Icen Projects.
- 3.10 The format of each public consultation event was considered appropriate to allow stakeholders and members of the public to browse the exhibition boards which outlined the development site and the proposed scheme. A copy of the exhibition boards from the first (Appendix A4) and second (Appendix A5) are included as appendices to this Report.
- 3.11 The format allowed attendees to question the project team representatives as well as interact and discuss the project with each other.
- 3.12 Feedback forms were provided at the event to allow attendees to offer feedback on the proposal. The feedback form was of a simple format to enable respondents to comment on any aspect of the development and elaborate on their thoughts as required. Attendees were also informed that they could take feedback forms away from the venue and send comments to the postal or dedicated email address that was provided. As a key aim of the event was to attain feedback on the proposals from the local community, attendees were encouraged to complete these forms, however no completed feedback forms were returned. An example of the feedback form provided can be found in Appendix A6.
- 3.13 Following the first consultation event, a project website was set up to share information on the development proposals more widely and to encourage more people to attend the second consultation event. A copy of the consultation boards from each event were available to view and access freely from, and an online feedback form was included to encourage visitor to the website to leave feedback in relation to the proposals.
- 3.14 All feedback received (including number of attendees) is outlined and analysed in Section 4.

Additional (“Non-Statutory”) Consultation Arrangements

Stakeholder Meetings

- 3.15 Two stakeholder meetings were arranged to provide more information in respect of the proposed development and opportunities to provide feedback. The stakeholder meetings are listed below:

Table 3.2 Stakeholder Meetings

Date	Venue	In Attendance
17 th August 2023	MS Teams	Cllr Philip Braat Cllr Angus Millar (Invite issued to all Ward 10 Councillors)
21 st August 2023	MS Teams	Pauline McNeill MSP (Invite issued to all Glasgow Labour MSPs)

3.16 An invite to arrange a video or phone call to discuss the project was also included in email correspondence to Blythswood and Broomielaw Community Council, however no response was received.

Project Website

3.17 A project website was set up for the proposed development following the first consultation event, to display information on the project and provide details on how to engage and was available for members of the public to freely access in their own time.

3.18 The website contained information in relation to the development site, including the site location, details of the development proposals and information on how to engage and provide feedback to the project team. A copy of the exhibition boards from the first (Appendix A4) and second (Appendix A5) consultation events were available to view and download from the website.

3.19 Feedback forms were available online via the webpage and an email address was set up for any queries and the submission of feedback at 249westgeorgestreet@iceniprojects.com.

3.20 In total, the dedicated web page had 621 visits throughout the consultation period.

Email Notification

3.21 Ahead of the second consultation event, an email notification was issued one week prior to all stakeholders providing details of the consultation event. Details of the event and the project website were included, along with information on how to engage.

Consultation Poster

- 3.22 Ahead of the consultation event on 5th September 2023, a poster was displayed at The Renfield Training and Conference Centre one-week in advance of the event. The poster outlined details of the upcoming consultation event and included details of the project website and how to engage.
- 3.23 A copy of the poster can be found in Appendix A7.

Pre-Application Discussions with Glasgow City Council

- 3.24 A formal Pre-Application Enquiry was submitted to Glasgow City Council in February 2023, and allocated the reference 22/00288/PRE. The formal pre-application meetings which have taken place between the design team and the Council in advance of the planning submission are outlined in the below table.

Table 3.3 Pre-Application Meetings (following formal submission of pre-application enquiry)

Date	Meeting	Comments
9 th August 2022	Planning and City Design	Meeting on site with Susan Connelly, Alan Shand & Raffa Esposito.
25 th October 2022	Planning and City Design	Meeting with Susan Connelly, Alan Shand & Raffa Esposito.
15 th December 2022	Planning and City Design	Meeting with Susan Connelly, Alan Shand & Raffa Esposito.
2 nd March 2023	Planning and City Design	Meeting with Susan Connelly, Alan Shand & Raffa Esposito.
July 2023	Planning and City Design	Meeting with Susan Connelly, Alan Shand & Raffa Esposito.
1 st August 2023	Planning and City Design	Meeting with Susan Connelly, Alan Shand & Raffa Esposito. Presentation and discussion on the set back of the upper floors and proposed elevational treatment. The principle of PBSA development at the site was confirmed to be acceptable.

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- 3.25 4 meetings took place with Glasgow City Council between August 2022 and March 2023 to agree the acceptability of the demolition of the existing building in principle. Following this, two meetings took place to agree the design of the new building and the new PBSA use. Following the last meeting on 1st August 2023, the final design was submitted to the Council for review. The design was agreed by GCC in principle subject to minor alterations, which have been incorporated into the final planning submission.
- 3.26 For a full summary of the pre-application discussions which have taken place with Glasgow City Council in advance of the application submission, please refer to the Planning Statement which accompanies the application for planning permission.

Summary

- 3.27 The pre-application consultation activities outlined above not only meet the statutory requirements, but also evidence that the applicant has gone beyond the statutory requirements in order to ensure a comprehensive and inclusive pre-application consultation.
- 3.28 As this section highlights, the project team were keen to ensure that the public and wider stakeholders were given sufficient opportunity to view and comment on the proposals and to positively influence the design of the proposed scheme.

4. ANALYSIS OF FEEDBACK

4.1 This section outlines the main comments which were received via the feedback forms provided on the day of the consultation events, and on the dedicated project website following the consultation events. The applicant's response is given to each of the issues raised in Table 4.1 below.

Feedback Received at the Consultation Events

4.2 Approximately 4 people attended the consultation events, including a representative from Blythswood and Broomielaw Community Council. Attendees were keen to find out more information in relation to the proposed development, and generally welcomed the proposals. Verbal feedback received was positive in terms of the redevelopment of the site to provide purpose built student accommodation within the City Centre, and support was noted for the smaller scale PBSA development.

4.3 Attendees were encouraged to fill out feedback forms, however unfortunately, no written feedback forms have been received to date following in-person public consultation events.

Feedback Received via the Dedicated Project Mailbox

4.4 The online feedback form function was operational from Tuesday 29th August 2023, in advance of the second public consultation event and a copy of the responses received is outlined in Table 4.1. A redacted copy of the feedback received can be found in Appendix A6.

Table 4.1 Feedback received via dedicated project mailbox.

Feedback	Applicant Response
I am very much in favour of retaining and retrofitting the existing building. Given that the existing building fits in with the existing surroundings much better than the proposed replacement and is in the Glasgow Central Conservation Area I feel that this would be the only responsible action, especially given the amount of embedded carbon during a climate crisis.	<p>Thank you for your comments.</p> <p>The potential for retention and adaption of the existing building has been assessed in full by the applicant, in line with the principles of sustainable development and a full suite of reports to justify the demolition are submitted to support the planning application.</p> <p><u>Structural Issues</u> With regard to the comments relating to the retention of the existing building, a Structural Survey has been undertaken by Woolgar Hunter, which highlighted several key issues with the building from a structural perspective. The existing sandstone facing has been "glued" on to the concrete backing of the building and there is extensive detachment at various locations due to expansive corrosion of</p>

	<p>the reinforcing bars within the concrete backing. These cladding units are currently a maintenance liability and, as the precast / sandstone cladding is load bearing above Level 1 (i.e., the elevational concrete panels support the floor slabs), removing and repairing the façade would present significant structural challenges.</p> <p>Investigations into the reinforcement cover of the existing structural elements determined that the cover to the slabs is inadequate and fire protection would be required to enhance all slabs, through intumescent coating or fire bonding.</p> <p>This would result in a further reduction to the floor to ceiling ratio which would present further marketability and environmental performance issues.</p> <p>In order to undertake the required structural works to the existing works, the Structural works to the Existing Building, the building would need to be reduced to ground level for remediation works and for the frame to be reconstructed but this would be limited to the existing foundation and original column grid, with the floor to ceiling ratios also reduced.</p> <p>Therefore, the current marketability issues with the existing building in terms of inflexible floorplate configurations would remain, whilst the floor to ceiling ratios would be further reduced. The new cladding would require additional insulation to meet current standards, therefore the cladding will protrude beyond the current building line.</p> <p>For full details, please refer to the Structural Survey which accompanies the planning application.</p> <p>The Applicant is pursuing full demolition of the existing building to allow for the erection of a modern, energy efficient and structurally sound building.</p> <p>This will have a number of benefits, with a notable increase in the sustainability and opportunities to create a more accessible and functional space, fit for 21st century user requirements. The full redevelopment of the site also offers the opportunity for a substantial redesign of the building's appearance, creating a structure which is more visually attractive and has a positive impact on surrounding listed</p>
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	<p>buildings and the wider Central Conservation Area.</p> <p><u>Environmental Performance</u></p> <p>In relation to the comments noting that the building should be retained or converted to office use, when a new build office development was being considered by the applicant, an M&E / ESG Report was prepared to support the pre-applications with Glasgow City Council to demonstrate that conversion was not viable. The Report highlighted that the existing building present several fundamental challenges that will prevent it from being refurbished to provide marketable Grade A Office Accommodation, as summarised below.</p> <ul style="list-style-type: none"> • In order to meet the Grade A Wellbeing Requirement, significant vertical ventilation risers would require to be formed within the floorplates to accommodate mechanical supply and extract ventilation ductwork. • Horizontal distribution of ventilation ductwork to meet these flowrates would require the existing ceiling height to be reduced to 2.3m (this is without a raised access floor which will also be required). This ceiling height is below the British Council for Offices recommendation of a minimum 2.45m ceiling for refurbishments. It would not be possible to install the necessary mechanical ducting in the existing building. Similarly, the provision of a 150mm raised access floor in the existing building and the mechanical ventilation for Wellbeing would result in a ceiling height of 2.15m, well below the BCO minimum recommendation of 2.45m. • In addition, due to the low floor to ceiling heights of the existing structure, it will only be possible to meet the ducted high fresh air requirements in an uncompromised manner via a full rebuild option. <p>Because of the reasons outlined above, it is therefore not viable for conversion of the existing building to Grade A office space or any other use, including PBSA.</p> <p>Please note that a Statement on Energy has</p>
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	<p>been prepared to demonstrate that the proposal will contribute to creating a low carbon economy and includes details of how the proposed development has been designed with consideration to resource use and to ensure a Gold Level compliance with the Building Standards plus 20% Low and Zero Carbon Generating Technologies (LZCGT).</p> <p><u>Heritage Considerations</u> With regard to the buildings contribution to the surrounding conservation area, a Heritage Statement was prepared to accompany the pre-application discussions with GCC, which provides detailed background evidence and analysis to demonstrate that the existing building at 249 West George Street is not of townscape value (and therefore does not contribute to the character or appearance of the Conservation Area. The Statement also lists a number of reasons that the demolition would not accord with national or local planning policy, as follows:</p> <ul style="list-style-type: none"> • Within the Glasgow Central Conservation Area Appraisal (2012), the existing building is not identified (as others are) as a non-listed building that contributes to the historic townscape and character of the Conservation Area (in fact the building is not mentioned at all); • The building was considered for listing by Historic Environment Scotland (HES) in 2012. The building was not listed at the time as it did not meet the criteria as a building of special architectural or historic interest; • No evidence is provided by the Council to explain why they believe the existing building makes a positive contribution to the Conservation Area; • No townscape value can be attached to the building in terms of the original design, intention, association or historic character. <p>The principle of the demolition has therefore been agreed and accepted by GCC during pre-application discussions.</p> <p>Furthermore, a high quality architectural response is proposed for the site that contributes positively to the heritage and character of the surrounding area. Full</p>
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	<p>assessment of the heritage implications of the proposal is available within the Heritage and Townscape Visual Impact Statement submitted in support of the application.</p> <p>A Circular Economy Statement has also been prepared to accompany the application for planning permission, which gives an overview of the interventions that will be applied to ensure circular economy principles are embedded within the design of the scheme over its lifetime. Please refer to this report for full details.</p> <p>Full details of the demolition construction and waste strategy procedures can be found within the supporting documents which accompany the planning application.</p>
<p>Hi, requesting that you provide some information - any information really - to back up your following statement.</p> <p>'The design team have investigated numerous options to repurpose the existing building. However, with its dated, non-compliant layout and restrictive ceiling heights it has proven to not be suitable for office or any other use. This, along the sandstone facade proving to be beyond economic repair, has led us to conclude that a full demolition and construction of a new building to current standards is the only viable option for this property.'</p> <p>What options? Why is it non-compliant? How can you make it compliant? What height are the ceilings? What options are there to addressing this? To what lengths have you reviewed re-using the existing fabric?</p> <p>How can we have an articulate consultation process if the elephant in the room doesn't even have a seat at the table? Demolition simply cannot be the de-facto decision for a 50 year old city centre building - transparent justification must be provided to claim the existing isn't fit for use. We're living in a climate emergency; we have a responsibility to the city's urban fabric not to repeat the mistakes of the past and to the natural environment not to pump wholly unnecessary levels of carbon into the atmosphere if we can absolutely help it. I'm not saying demolition isn't the answer, but we have a responsibility to act impartially in the stewardship of our built environment.</p>	<p>Thank you for your comments.</p> <p>Please refer to the applicant's response above.</p>

<p>There's also not a single comment throughout your consultation boards that reference any awareness of climate impact, embodied carbon or sustainable strategies for the proposed, I get it's early in the process, but these are fundamentals that have to be present if the proposal is to enact any sense of positive change environmentally. If you're demolishing, what's your strategy to offset the carbon and re-use materials? New build steel frame - how are you addressing the huge, embodied carbon in the fabrication and transportation of materials? Energy use - are you considering high airtightness / low energy use principles? I know you won't have the answers at this stage but please identify and address these issues appropriately so the necessary conversations can be had going forward.</p>	
<p>I am an artist and have a studio in the building at 249 West George Street. I also work for MugStock and have an office in the building. I do not support this proposal and I will lay out the reasons why below.</p> <p>In the proposal it states that the ceilings are restrictive. This is not the case: the ceiling is of a normal height for office use. The building formerly consisted of Creative Scotland Offices and currently is used for office space as well as other uses. The ceiling height is not at all restrictive, and the building seems to be in a good, usable condition. It could use some modernisation, and this would be at a fraction of the cost of knocking the building down and building an entirely new one.</p> <p>The energy and resources embedded within the building are significant and could be easily preserved with appropriate and targeted renovation work. This option should be seriously considered. Knocking down an existing building only to replace it with another comes at a huge environmental cost; one which should be a last option in this time of climate crisis.</p> <p>The proposal to build student accommodation is a luxury, with most students unable to afford the cost of brand new bespoke accommodation. In fact, students being housed in the private sector is something that students have done for years and is generally a much more affordable option for them. It makes good use of buildings, with all rooms in a building usually let out, thereby</p>	<p>Thank you for your comments.</p> <p>Please refer to the applicant's response above</p>

<p>making good use of existing urban accommodation. There may be a housing shortage, but student accommodation is not the problem and building luxury student flats will not be the solution.</p> <p>The building is being occupied by well-established charities, community organisations and artists, who make very good use of the space, and would be glad to keep doing so. The building's structure is in no way restrictive for these purposes.</p> <p>In summary, I oppose the plans to demolish this perfectly usable building and build a new structure with the associated huge environmental costs and displacement of creative communities and charities.</p>	
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5. CONCLUSION

- 5.1 This Pre-Application Consultation (PAC) Report provides a synopsis of the pre-application consultation undertaken by the applicant with regards to the proposed development at 249 West Geroge Street, Glasgow. The consultation meets the statutory requirements set out in The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, as amended by The Town and Country Planning (Pre-Application Consultation) (Scotland) Amendment Regulations 2021.
- 5.2 In line with the Regulations, statutory pre-application consultation has taken place and this PAC Report provides evidence that the statutory requirements for pre-application consultation have been met.
- 5.3 During the pre-application consultation period, the project team were keen to ensure that the public and wider stakeholders were given the opportunity to comment on the proposals and to positively influence the design of the scheme.
- 5.4 The dedicated project website and two rounds of in-person consultation events provided information about the site and development proposals. The consultation events were arranged whereby members of the project team were available to answer any questions from members of the public about the proposals. The second consultation included information on the feedback received during the pre-application period, and how the applicant had addressed these.
- 5.5 This PAC Report summarises the consultation which was undertaken prior to the submission of the planning application and confirms that the submission complies with the statutory requirements of the Regulations and outlines the additional consultation which was undertaken beyond these requirements. Overall, the applicant has taken onboard the comments received during the extensive pre-application consultation process.

A1. PROPOSAL OF APPLICATION NOTICE

A2. NEWSPAPER ADVERTISEMENT – FIRST EVENT

A3. NEWSPAPER ADVERTISEMENT – SECOND EVENT

A4. CONSULTATION BOARDS – FIRST EVENT

A5. CONSULTATION BOARDS – SECOND EVENT

A6. FEEDBACK RECIEVED

A7. POSTER DISPLAYED AT VENUE