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Planning Statement

Demolition of Existing Building and Erection of
Purpose-Built Student Accommodation

249 West George Street, Glasgow

Iceni Projects Limited on behalf of
Courie Investments Limited

October 2023

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Planning Statement
DEMOLITION OF EXISTING BUILDING AND ERECTION
OF PURPOSE-BUILT STUDENT ACCOMMODATION

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1. INTRODUCTION

1.1 This Planning Statement has been prepared on behalf of Courie Investments Limited (“the applicant”) in support of an application which seeks full Planning Permission and Conservation Area Consent for Purpose Built Student Accommodation (hereafter referred to as “PBSA”) at 249 West Geroge 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 proposed development is classified as ‘major’ development in accordance with the Scottish Government Circular 5/2009: Hierarchy of Developments. In compliance with procedures for major applications, as outlined in the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 and The Town and Country Planning (Pre-Application Consultation) (Scotland) Amendment Regulations 2021, a Proposal of Application Notice was submitted to Glasgow City Council (GCC) in July 2023 (ref: 23/01725/PAN). During the intervening time, pre-application discussions have taken place between the applicant and a variety of stakeholders which has informed the content of the final application,

1.4 Section 3 of this Planning Statement summarises this consultation and supplements the Statutory Pre-Application Consultation (PAC) Report prepared by Icen Projects, which details the statutory consultation which has been undertaken prior to the submission of this application, in accordance with the Regulations.

1.5 The application is supported by a suite of supporting documents which should be read in conjunction with this Statement. These include:

- Architectural Drawings (prepared by Mosaic Architecture & Design)
- Design & Access Statement (prepared by Mosaic Architecture & Design)
- Pre-Application Consultation Report (prepared by Icen Projects)
- Student Statement of Need (prepared by Icen Projects)
- Demolition Justification Cover Note (prepared by Icen Projects)
- Management and Security Strategy (prepared by Icen Projects)

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- Heritage and Townscape Visual Impact Assessment (HTVIA) (prepared by Icen Projects)
 - Socio-Economic Infographic (prepared by Icen Projects)
 - Statement on Energy (prepared by KJ Tait)
 - Drainage Strategy (prepared by Woolgar Hunter)
 - Stage 1 Desk Study Site Investigation (prepared by Woolgar Hunter)
 - Daylight and Sunlight Assessment (prepared by GIA)
 - Transport Statement (prepared by Kevin Clarke)
 - Circular Economy Statement (prepared by Icen Projects)
 - Landscape Strategy (prepared by OOBE)
 - Structural Survey (prepared by Woolgar Hunter)
 - Viability Assessment (prepared by Courie Investments Ltd).

1.6 This Statement sets out the supporting context for the redevelopment of the site for PBSA development. The document comprises the following sections:

Section 2: Site Context: outlines the characteristics and the planning history of the site, as well as the wider surroundings;

Section 3: Proposed Development & Pre-Application Consultation: outlines the key aspects of the proposed development and summarises the outcomes of the statutory pre-application process;

Section 4: Development Plan: assesses the proposal against the statutory development plan;

Section 5: Material Considerations: reviews and assesses the key material considerations which are relevant to the proposal;

Section 5: Statement on Community Benefit: outlines how the proposal will respond to the requirements of NPF4's Policy 16;

Section 7: Conclusions: presented the key conclusions of the Planning Statement, presenting the overall case for the proposed development.

2. SITE CONTEXT

Site and Surroundings

- 2.1 The extent of the application site is indicated within the redline boundary of the below plan:

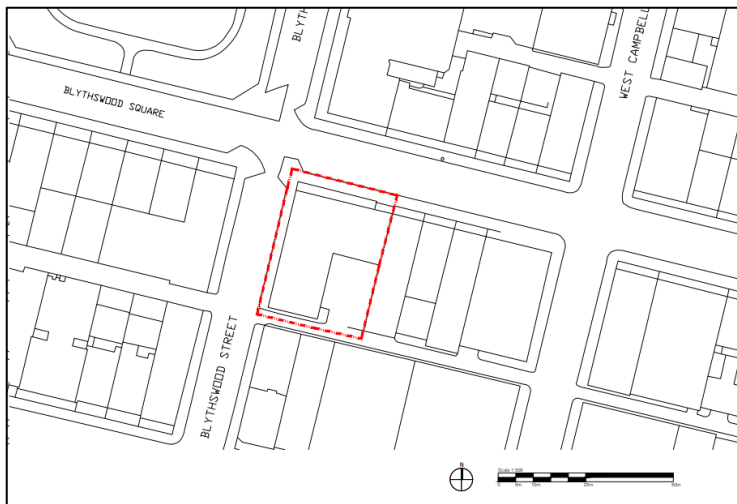


Figure 2.1: Extract from Site Location Plan (drawing ref: 22004-MOS-ZZ-XX-DR-A-01-000)

- 2.2 The site area is approximately 1,025 sqm (0.10ha) and comprises a 1970's office building, situated at the corner of West George Street (principal elevation) and Blythswood Street within Glasgow City Centre. The existing building provides office accommodation over ground and five upper floors. The site bounds onto West George Lane to the south and contains an area of surface car parking in the southeast corner, accessed via the lane.
- 2.3 The site is bound by B-listed buildings in all directions, although the listed building to the south (202-228 St Vincent Street) contains a modern rear extension which faces the proposal site at 249 West George Street. North of the site lies the Kimpton Blythswood Square Hotel, which occupies the former Royal Scottish Automobile Club (RSAC) Headquarters on Blythswood Square. The site is bound by office space to the east, west and south.
- 2.4 The immediate area is characterised by a wide variety of uses, primarily office and hotel space, with smaller areas of retail and residential. The site lies in close proximity to both Sauchiehall Street and Buchanan Street in Glasgow City Centre, which provide a vast range of primarily leisure uses, such as entertainment facilities, retail, restaurants, pubs and cafes.
- 2.5 The surrounding area – particularly to the west of Blythswood Square – has undergone significant regeneration in recent years. Of note is the nearby Moda Living development (Holland Park), a 443-

flat BTR development on the site of the former Strathclyde Police Headquarters, Pitt Street. The development is currently under construction, with completion expected in 2024.

- 2.6 As a result of this regeneration, the character of the surrounding area is changing with a number of new buildings being introduced, serving to influence and improve the prevailing townscape. A number of these new developments seek to increase the residential population in the city centre, in line with strategic Council-wide policies and aims on city centre living.
- 2.7 The office space, while still partially occupied, has been unable to attract occupiers on traditional office leases since the collapse of DLA Piper's lease over the entire building in 2015. There are a variety of site-specific factors which have contributed to the situation; chief among these are deficiencies in the building's design which render it unadaptable to modern Grade-A office requirements which are now routinely expected by prospective tenants in this area of the city. The positioning of the lift cores prevents floor layouts being altered or adapted to meet differing needs, while the small lifts provided fall short of the requirements of the most recent Equality Act Legislation. Basic refurbishments and repairs to the building will no longer provide office space that would be expected by the market. As such, the applicant seeks demolition of the existing building in order to provide a new purpose built student accommodation development.
- 2.8 Further justification for the requirement for full demolition of the existing building is provided in the supporting 'Demolition Justification Cover Note which accompanies the application. This Statement also outlines why the full conversion of the site to modern Grade-A office space is commercially unviable.

Heritage

- 2.9 The site is a non-designated building, located within the District and Blythswood Character Area of the Central Conservation Area. 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. Furthermore, the building was considered for listing by Historic Environment Scotland (HES) in 2012, and the building was not listed at the time as it did not meet the criteria as a building of special architectural or historic interest.
- 2.10 There are several listed buildings within the vicinity. Adjacent listed buildings to the application site include:
- 239-247 West George Street (Category B)
 - 250-256 West George Street (Category B)
 - 202-228 St Vincent Street (Category B)
 - 232-234 St Vincent Street (Category B)
 - 14-20a Blythswood Square and 108 Douglas Street (Category B)

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- 8-13 Blythswood Square, 173 West Regent Street, 258 West George Street, 135 West Regent Lane (Royal Scottish Automobile Club) (Category B)

2.11 A full assessment of the heritage implications of the proposal is available within the Heritage and Townscape Visual Impact Statement submitted in support of the application.

Transport and Accessibility

2.12 The site is located within the City Centre and within an area designated as having high public transport accessibility as per the map associated with SG11. The site occupies a highly sustainable location and benefits from the proximity of numerous public transport nodes. The site is within a 10-15 minute walk of three train stations – Charing Cross, Glasgow Central and Glasgow Queen Street. The site is also within a short distance of Cowcaddens Subway Station, Buchanan Subway Station (10-minute walk), and Buchanan Bus Station (15-minute walk – for regional and national bus services).

2.13 A local bus service (Number 2) runs adjacent to the site along West George Street and provides a frequent service to Glasgow's East End via the City Centre – the corresponding westbound service can be accessed along St Vincent Street. There is a greater variety of local bus services running along Sauchiehall Street, a 5-minute walk from the site.

2.14 The site lies within a 25-minute walk of several of Glasgow's higher and further education institutions, including the University of Glasgow, the University of Strathclyde, Glasgow Caledonian University, the Royal Conservatoire of Scotland, the Glasgow School of Art and City of Glasgow College (City Campus and Riverside Campus).

2.15 Vehicular access to the site is provided via surrounding streets – with parking presently located to the rear along West George Lane – while the principal pedestrian access is located on West George Street.

2.16 The site is close to several local amenities with a variety of shops and services located along Sauchiehall Street and Bath Street, while the site is also a short walk from the St Enoch Centre, Buchanan Street and the Merchant City. It is therefore very well located for access to retail, leisure, employment and entertainment facilities. The site is also within a 15-minute walk of the River Clyde Walkway and a 20-minute walk of Kelvingrove Park, which provide extensive access to green space and outdoor recreation.

2.17 For full details of the accessibility of the site in terms of public transport, please refer to the Transport Statement prepared by Kelvin Clarke which accompanies this application.

Flood Risk

- 2.18 The SEPA online flood maps confirm that the site is not susceptible to river, surface water or coastal flooding.

Ecology

- 2.19 The site is not subject to any ecological designations.

Planning History

- 2.20 A search on Glasgow's online planning portal confirms the recent planning history of the site, as detailed in Table 2.1 below.

Table 2.1 Relevant Planning History

Reference	Description of Development	Decision and Date
23/00750/FUL	Application under Section 42 of the Town and Country Planning (Scotland) Act 1997 for non-compliance with Condition 1 associated with planning consent 17/02885/DC.	Awaiting determination – validated 30 th March 2023
17/02885/DC	Use of office (Class 4) as hotel (Class 7) and bar/restaurant (Sui Generis) including a single storey roof extension and rear courtyard extension with associated external alterations.	Granted subject to conditions – 19.12.2017
16/02394/DC	Use of office (Class 4) as hotel (Class 7) including bar/restaurant (Sui Generis) erection of single storey extension and associated external alterations.	Granted subject to conditions – 22.02.2017
15/00967/DC	Refurbishment of external stone cladding and windows on north and west elevation.	Granted subject to conditions – 12.06.2015

- 2.21 Recent applications had received planning permission at the site for the reuse of the existing building as a hotel space and associated bar/restaurant, with a roof extension and internal and external alterations. More recently, the present applicant has submitted a Section 42 application in respect of

the most recent hotel consent to vary a condition (Ref: 23/00750/FUL). This Section 42 application is currently pending.

2.22 Planning permission 17/02885/DC and 16/02394/DC demonstrate that the principle of redevelopment of the site for alternative uses is acceptable and would contribute positively to the surrounding area.

2.23 In bringing forward this current proposal seeking the erection of a student accommodation development, the applicant has taken cognisance of the design of planning permission 17/02885/DC, and the current proposal reflects this permission in terms of height, massing and scale. Further information on the proposed development is set out in Section 3 of this Statement.

3. PROPOSED DEVELOPMENT

3.1 The proposed development provides for the comprehensive redevelopment of the site to create a high-quality purpose built student accommodation (PBSA) scheme that will benefit from the site's sustainable location and make a positive contribution to the character and viability of the local area.

3.2 The site is well located to access several nearby HE institutions and is not located within a defined PBSA area of over-concentration as per SG10.

3.3 The full description of the development is as follows:

'Demolition of existing building and erection of Purpose-Built Student Accommodation with associated amenity, access and other ancillary works'.

3.4 The proposal is described in detail in the supporting Design and Access Statement and associated architectural drawings. The key elements of the proposed development can be summarised as follows:

- Demolition of the existing office block which currently occupies the site;
- Erection of a Ground + 6-storey purpose-built student accommodation block, comprising:
 - 147 student rooms ranging in size from 18.1sqm to 42.3sqm. 146 of these are proposed as studio flats, with one accessible apartment. Including the accessible apartment, a total of 6 of these rooms are proposed to be fully accessible.
 - Provision of 738sqm of amenity space, comprising 525sqm internal amenity space (at Basement Level and Level 00) and 213sqm of external amenity space (at Level 00 and 06). Amenity space to include gaming room, gym, study areas and breakout space, cinema, games area, seating area, kitchen and outdoor courtyard and terraces.
- Servicing to be taken from the rear of the proposed building along West George Lane.
- Safe, secure and internal cycle parking to be provided at basement level for use by residents and staff, with space for 81 bikes.
- Use of high-quality materials comprising blonde sandstone with a rusticated finish at lower levels and an ashlar finish on upper levels and grey standing seam metal roof to create a building of exceptional architectural quality, contributing positively to the surrounding townscape of Blythswood Square and the character of the Central conservation area.

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- 3.5 For further details on the design of the proposed development, please refer to the Design and Access Statement submitted in support of the application.

Pre-Application Consultation

- 3.6 As the development is defined as “Major” under the Town and Country Planning (Hierarchy of Development) (Scotland) Regulations 2009, in line with the pre-application consultation procedures outlined within the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 and as amended by The Town and Country Planning (Pre-Application Consultation) (Scotland) Amendment Regulations 2021, a Pre-Application Consultation (PAC) Report has been submitted in support of the application.
- 3.7 A formal Pre-Application Enquiry was submitted to Glasgow City Council in February 2023 (ref. 22/00288/PRE), and a number of subsequent formal pre-application meetings took place between the applicant, design team and the Council in advance of the planning submission. 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.
- 3.8 In line with the Regulations, statutory pre-application consultation has taken place and the PAC Report provides evidence that the statutory requirements for pre-application consultation have been met, including the hosting of two in-person events, and a meeting with a group of Glasgow Labour MSPs and a number of Glasgow Ward 10 Councillors.
- 3.9 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. Feedback received throughout the consultation period was generally supportive of the redevelopment of the site. Queries were raised in relation to the viability of retention and conversion of the existing building. Embodied carbon and the sustainability of the proposed development have been fully responded to within the Pre-Application Consultation (PAC) Report.
- 3.10 A dedicated project website was also set up to share information on the development proposals more widely and to encourage additional feedback on the proposals. Full details and analysis of the feedback received from the two events are summarised in the accompanying PAC Report included within the submission.

3.11 Please refer to the PAC Report for full details of the pre-application consultation undertaken, and how the design team responded to the queries raised throughout the consultation process.

4. DEVELOPMENT PLAN ASSESSMENT

- 4.1 This section provides an overview of the key development plan provisions and policies as they relate to the proposed development.

The Development Plan

- 4.2 Section 25 of the Town and Country Planning (Scotland) Act 1997 (as amended) states that:

“Where making any determination under the planning Acts, regard is to be had to the development plan, the determination is, unless material considerations indicate otherwise, to be made in accordance with that plan”.

- 4.3 The development plan in this case comprises the adopted Fourth National Planning Framework (NPF4) (2023) and the adopted Local Development Plan (LDP) – Glasgow City Development Plan (2017).

- 4.4 Unlike previous versions of the Scottish National Planning Framework, NPF4 forms part of the statutory development plan alongside LDPs and their adopted supplementary guidance and is a key consideration in the determination of planning applications.

- 4.5 Following its adoption on 13th February 2023, NPF4 superseded both NPF3 and Scottish Planning Policy (SPP) (2014), as well as Strategic Development Plans (SDPs) which no longer form part of the development plan.

National Planning Framework 4 (2023)

- 4.6 NPF4 was approved by Scottish Ministers on 11th January 2023, before being formally adopted by Scottish Ministers on 13th February 2023. NPF4 is the national spatial strategy for Scotland and sets out the Scottish Government’s spatial principles, regional priorities, national developments, and national planning policy.

- 4.7 NPF4’s ‘National Planning Policy’ is presented under the three themes of Sustainable Places, Liveable Places and Productive Places. Its specific policies are to be used in the determination of planning applications.

- 4.8 We consider the following policies to be of relevance to this planning application and provide commentary in relation to each below.

Sustainable Places

- 4.9 **Policy 1: Tackling the climate and nature crises** gives significant weight to the global climate and nature crises when considering development proposals.
- 4.10 In accordance with Policy 1, the proposed development will address the climate and nature crisis by providing much needed purpose built student accommodation within Glasgow City Centre. The development will incorporate sustainable technologies in a manner which will ensure current carbon dioxide emissions reduction targets will be met.
- 4.11 Construction materials will also be sourced from local manufacturers with sustainable components where possible to support circular economy principles. A Circular Economy Statement has been prepared by Iceni Projects to provide 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 Statement for full details.
- 4.12 The proposed development represents an opportunity to tackle the climate and nature crisis by ensuring a new sustainable development is built to replace the existing building which, as a result of its 1970s design, is highly unsustainable and is now many years beyond its lifespan.
- 4.13 The proposal is sited within a highly accessible and sustainable location within the City Centre where all key services and facilities - education, employment, commercial, retail, recreational, health - facilities are accessible via active travel and public transport in accordance with 'local living' and '20 Minute Neighbourhood' principles.
- 4.14 The proposed development's positive contribution towards tackling the climate and nature crises should be afforded significant weight in the determination of this application.
- 4.15 **Policy 2: Climate mitigation and adaption** requires development proposals to be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible and to adapt to current and future climate change risks.
- 4.16 The site is located in a highly sustainable area with access to all required amenities and facilities within easy walking distance. Ample secure cycle parking is also proposed to encourage residents to use active travel modes. Furthermore, no car parking is proposed which will further reduce the reliance on unsustainable transport modes and reduce the potential for greenhouse gas emissions. All of these factors demonstrate that the proposal's compliance with NPF4 Policy 2.
- 4.17 **Policy 3 (Biodiversity)** seeks to protect biodiversity, reverse biodiversity loss, deliver positive effects from development and strengthen nature networks.

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- 4.18 The site in its current form offers no benefits for local biodiversity. Given the nature of the site in an urban, high density city centre location, opportunities for maximising biodiversity are limited, Notwithstanding, the proposed development will lead to the creation of outdoor terraced areas where it would be possible to provide measures to promote biodiversity, particularly within the external courtyard proposed at Level 00.
- 4.19 **Policy 7 (Historic assets and places)** aims to protect and enhance historic environment assets and places, and to enable positive change as a catalyst for the regeneration of places.
- 4.20 In respect of development proposals within conservation areas, Policy 7 states that these will only be supported where the character and appearance of the conservation area and its setting is preserved or enhanced. Policy 7 also states that where demolition within a conservation area is to be followed by redevelopment, consent to demolish will only be supported when an acceptable design, layout and materials are being used for the replacement development.
- 4.21 The proposal is for a new high-quality building which will replace the existing building. Analysis presented within the submitted Heritage, Townscape and Visual Impact Assessment (HTVIA) which demonstrates that the proposed building would be sympathetic to the settings of the surrounding heritage assets and remains contextual and will contribute to local distinctiveness. A visual assessment has also been undertaken which demonstrates that the proposals are anticipated to have beneficial, neutral or negligible effect on the character of Blythswood Square or the surrounding townscape. For a full assessment of the proposal of the heritage considerations of the proposed development, please refer to the HTIVA and the assessment of under Glasgow City Development Plan Policy CDP9 below.
- 4.22 The proposed development has been designed to complement the character of the surrounding area through layout, design, massing, height and choice of materials. At pedestrian level, it will serve to create a more attractive frontage onto both West George Street and Blythswood Street. Within the wider townscape the building will respond positively to surrounding prominent buildings and consented development, including nearby Holland Park.
- 4.23 Furthermore, the design of the building follows the same footprint and massing as was previously approved at the site under planning permission 17/02885/DC. The proposed student accommodation will sit at a lower height than the consented hotel-led development.
- 4.24 It is therefore considered that the proposed development complies with NPF4 Policy 7.
- 4.25 **Policy 9 (Brownfield, vacant and derelict land and empty buildings)** seeks to encourage, promote and facilitate the sustainable reuse of brownfield, vacant and derelict land and empty buildings, and to help reduce the need for greenfield development. Policy 9 also states a preference

for the re-use of existing buildings where possible – however, it does not rule out demolition to facilitate redevelopment if the existing building is not suitable for sustainable conversion.

- 4.26 The proposal is for the demolition of the existing building and the redevelopment of the site to provide a high-quality, sustainable replacement. The current building is no longer suitable for its intended use, with the existing fabric many years beyond its lifespan. It is not energy efficient and is incapable of being refurbished or adapted into productive use via commercially feasible means. This has been demonstrated by the Applicant's inability to establish traditional office tenancies for the property, as the existing building now falls far short of the requirements of modern office occupiers, particularly in regard to city centre Grade A space, as outlined within the Demolition Justification Cover Note submitted as part of this planning application. The proposed new building is intended to be of higher architectural quality, with a more positive impact on the surrounding streetscape and on the wider Central Conservation Area.
- 4.27 In addition, redevelopment offers the chance to sustainably re-use this site by creating a modern building with the latest carbon reducing technologies to ensure that net emissions throughout the building's lifespan will be significantly less than if left in its current condition.
- 4.28 The proposed building will result in an increase in useable floorspace across the site, as the area currently in use as external surface car parking and basement parking access will be converted to use as an external courtyard and amenity space.
- 4.29 By maximising the site density through height and layout, the proposal represents a more efficient use of space within Glasgow City Centre which in itself ensures sustainability outcomes are addressed positively. The new building has also been designed to be adaptable to future uses, if required at some point in its future.
- 4.30 The proposal therefore complies with NPF4 Policy 9 in that it will allow for the sustainable re-use of an urban brownfield site which will have a net beneficial outcome for sustainability.
- 4.31 **Policy 12 (Zero Waste)** states that development proposals will be supported where they reuse existing buildings and infrastructure; minimise demolition and salvage materials for reuse; minimise waste; use materials with the lowest forms of embodied emissions; and use materials that are suitable for reuse with minimal reprocessing.
- 4.32 The proposed development will use local, sustainably sourced materials during construction where possible. The feasibility of salvaging some of the fabric of the existing building will also be explored, though given the age and state of repair of the building, this may not be a viable option. Overall, the proposed development observes the waste hierarchy and will accord with its principles.

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- 4.33 The proposed development therefore complies with Policy 12.
- 4.34 **Policy 13 (Sustainable Transport)** will encourage, promote and facilitate developments that prioritise walking, wheeling, cycling and public transport for everyday travel and reduce the need to travel unsustainably.
- 4.35 The site is located in a highly sustainable area which is recognised as an area of high public transport accessibility by Glasgow City Council. All required services are located within a short walk from the site, removing the need to use private transport. This is reflected by the development being car-free. For full details of the accessibility of the site in terms of public transport, please refer to the Transport Statement prepared by Kelvin Clarke which accompanies this application.
- 4.36 The site is within close proximity of the next phase of Glasgow’s Avenues project, currently under construction along Pitt Street and Holland Street. This will include the provision of expanded pedestrian areas, landscaping and – most notably – a two-way segregated cycle lane along the route, connecting existing cycle lanes along Waterloo Street and Sauchiehall Street. This will ensure the site is well connected to the wider cycle network, with direct traffic-free or low traffic access to the West End and Glasgow City Centre.
- 4.37 The proposed development is therefore fully supported by the terms of NPF4 Policy 13.

Liveable Places

- 4.38 **Policy 14 (Design, quality and place)** seeks to encourage, promote and facilitate well designed development that makes successful places by taking a design-led approach and applying the Place Principle.
- 4.39 The design of the proposed development has been informed by a detailed analysis of the surrounding area and townscape and reflects a design-led approach to the redevelopment of the site. It also follows the massing, height and form of the consented hotel development at the site which was previously supported by Glasgow City Council. Please refer to the submitted Design and Access Statement for further information.
- 4.40 **Policy 15 (Local Living and 20 minute neighbourhoods)** seeks to encourage, promote and facilitate the application of the Place Principle and create connected and compact neighbourhoods where people can meet the majority of their daily needs within a reasonable distance of their home, preferably by walking, wheeling or cycling or using sustainable transport options.
- 4.41 As noted above, the site’s City Centre location is highly sustainable and meets and exceeds the criteria for 20-minute neighbourhoods. Future residents will have excellent access to all necessary

amenities, and the proposed development will fully reflect local living principles. The proposed development is therefore supported by the terms of NPF4 Policy 15.

- 4.42 **Policy 16 (Quality homes)** aims to encourage, promote and facilitate the delivery of more high quality, affordable and sustainable homes, in the right locations, providing choice across tenures that meet the diverse housing needs of people and communities across Scotland. This specifically includes homes for people undertaking further and higher education.
- 4.43 The proposed development will create 147 new student accommodation beds within Glasgow. A PBSA Needs and Demand Assessment has been submitted in support of this application. This assessment demonstrates that there is a clear unmet demand for additional PBSA bedspaces within Glasgow.
- 4.44 The proposed development will therefore help to meet an identified need for more student bed spaces in Glasgow, in compliance with NPF4 Policy 16. The creation of new dedicated student bed spaces will also relieve pressure on Glasgow's mainstream housing land supply by freeing up HMO properties for family housing. Again, this is directly in compliance with the requirements of Policy 16.
- 4.45 **Policy 19 (Heating and Cooling)** aims to encourage, promote and facilitate development that supports decarbonised solutions to heat and cooling demand and ensure adaptation to more extreme temperatures. Buildings that will be occupied by people will be supported where they are designed to promote sustainable temperature management.
- 4.46 The proposed building will be significantly more energy efficient than the current property and will encourage active temperature management, through measures such as positioning of windows and choice of materials. The proposal is compliant with Policy 19.
- 4.47 **Policy 22 (Flood Risk and Water Management)** aims to strengthen resilience to flood risk and reduce the vulnerability of existing and future development to flooding.
- 4.48 According to SEPA Flood Maps, the proposed development is not located within or adjacent to an area at risk of flooding. The proposed development at 249 West George Street meets the requirements of the relevant Policy 22 criteria in that it will not increase the risk of surface water flooding to others, or itself be at risk, will manage all rain and surface water through sustainable urban drainage systems (SUDS), has sought to minimise the area of impermeable surface and has demonstrated that it can be connected to the public water mains. A Drainage Strategy has been prepared by Woolgar Hunter to demonstrate that the application accords with the provisions of Policy 22. Please refer to this report for full details. The proposal therefore complies with Policy 22.

Productive Places

- 4.49 **Policy 25 (Community wealth building)** seeks to encourage, promote and facilitate a new strategic approach to economic development that also provides a practical model for building a wellbeing economy at local, regional and national levels.
- 4.50 The proposed development supports the principles of community wealth building. It will bring back into active use this vacant site in a key location within the City Centre and will provide accommodation for 147 students who will contribute to the local economy through increased spend in the community, and support local employment and supply chains. The full benefits of the proposed development are set out in the supporting Socio-Economic Infographic prepared by Icen Projects which accompanies the application.
- 4.51 **Policy 27 (City, town, local and commercial centres)** seeks to encourage, promote and facilitate development in city and town centres, recognising that they are a national asset. This will be achieved by applying the Town Centre First approach to help centres adapt positively to long-term economic, environmental and societal changes, and by encouraging town centre living.
- 4.52 The application site is within the City Centre and as such is the most sequentially preferable location for this type of development. It will also introduce more residents to the City Centre, an aim which is directly supported by Policy 27 of NPF4.

Glasgow City Development Plan (2017)

- 4.53 The Glasgow City Development Plan (LDP) was adopted in March 2017 and sets out the Council's strategy, policies and proposals relating to the development and use of land in the Glasgow area.
- 4.54 The Plan puts forward positive measure that will allow Glasgow to make the most of its resources for the benefits of residents, businesses, employees and visitors, and is supported by relevant Supplementary Guidance (SG), Interim Planning Guidance (IPG) and background papers.
- 4.55 The key aims of the CDP are to create and maintain a healthy, high quality place and to develop a compact city form that supports sustainable development. The CDP sets out a strategy that seeks to deliver the following four strategic outcomes:
- A vibrant place with a growing economy;
 - A thriving and sustainable place to live and work;
 - A connected place to move around and do business in; and
 - A green place.

Site Allocation

- 4.56 An extract from the CDP Policy and Proposals Map can be found below, with the indicative site location highlighted in red:



Figure 4.1: Extract from Glasgow City Development Plan (2017)

- 4.57 The site lies within the Glasgow City Boundary, where overarching policies CDP1 (The Placemaking Principle) and CDP2 (Sustainable Spatial Strategy) will apply.
- 4.58 The site is within the City Centre Principal Office Area (SG4) and the City Centre Strategic Economic Investment Location (IPG3). The site is also located within the Central Conservation Area (SG9) and is recognised as an Area of High Public Transport Accessibility as defined by SG11.
- 4.59 In circumstances where there are no site-specific land use policy designations, proposals will be considered on their individual merit following assessment against relevant LDP policies. We consider the proposed development's compliance with the relevant CDP policies – and accompanying SG – in the following sections.

CDP1 and SG1: The Placemaking Principle

- 4.60 Policy CDP1 and the corresponding SG1 applies to all development proposals across the city. CDP1 and SG1 aims to deliver creative, innovative and technical standards in design of buildings. The policy seeks to instil a creative and holistic approach to regeneration in the City and to promote successful and sustainable outcomes. This Policy aims to improve the quality of development taking place in Glasgow by promoting a design-led approach. This will contribute towards protecting and improving the quality of the environment, improving health and reducing health inequality, making the planning process as inclusive as possible and ensuring that new development attains the highest sustainability levels.

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- 4.61 Placemaking involves understanding the elements that contribute to an area, considering what is currently successful and what is failing. The aim is for new development to contribute towards the creation of successful places, based upon balancing the relationship between the physical, social and economic characteristics of the area.
- 4.62 The planning submission is accompanied by a Design and Access Statement which provides a full analysis of the surrounding streetscape, scale and density and the rationale for the adopted approach, and a Heritage and Townscape Visual Impact Assessment. The documents submitted with the application demonstrate that the overall aims of CDP1 have been met.
- 4.63 The proposals have emerged through engagement with Glasgow City Council, the public and other key stakeholders and the resultant proposal will create a sustainable, attractive and vibrant building which respects the surrounding historic environment on a currently under used brownfield site within a sustainable city centre location.

Principle of the Proposed Use

- 4.64 Based on the current and historical uses in the vicinity of the site, the site is considered appropriate for a student accommodation development. The proposed new building will provide a more attractive street frontage and will make significantly better use of available space within the site, providing a more adaptable building footprint and covering the existing surface car park with communal amenity space. The City Development Plan promotes the sustainable re-use of brownfield sites and supports the delivery of purpose built student accommodation in appropriate locations within the city.
- 4.65 Full detailed analysis of the creative and iterative process undertaken during the design development can be found in the Design & Access Statement submitted in support of this application.
- 4.66 SG2: Placemaking Part 2, offers more detailed guidance on a variety of topics. The proposed development is assessed against the relevant topics below:

Cultural Heritage

- A high-quality architectural response is proposed for the site which contributes positively to the heritage and character of the surrounding area. Analysis presented within the submitted Heritage, Townscape and Visual Impact Assessment (HTVIA) which demonstrates that the proposed building would be sympathetic to the settings of the surrounding listed buildings or the wider Conservation Area and remains contextual and will contribute to local distinctiveness. A visual assessment has also been undertaken which demonstrates that the proposals are anticipated to have beneficial, neutral or negligible effect on the character of Blythswood Square or the surrounding townscape.
- 4.67 Full assessment of the heritage implications of the proposal is available within the Heritage and Townscape Visual Impact Assessment (HTVIA) prepared by Icen Projects submitted in support of

the application. An assessment of the impact of the proposed development on the special interest of the identified listed buildings, as well as the character and appearance of the conservation area, in the context of key heritage legislation and planning policy, is provided within the document. A full assessment of the heritage considerations for the proposed development is outlined below under CPD9 / SG9 (Historic Environment).

Inclusive Design

- 4.68 SG1 outlines that inclusive design goes beyond the traditional concept of accessibility and takes a wider account of the diverse nature and complexity of individuals and communities. Inclusive design is informed by age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
- 4.69 The overall access strategy has been developed with a focus on inclusively and access for all. The external pavement offers level access and is fully accessible to all pedestrians including wheelchair users. The building will have an automated entrance door with a push pad access control into the main entrance. This will be fully accessible for wheelchair users and those with limited mobility. The external courtyard amenity space will also be fully accessible. There are lifts near the main entrance at ground floor level, which provide access to all floors within the building. The lifts will be maintained by the eventual operators and factors of the building to ensure that inclusive access to the development will be maintained. As such, the proposals are compliant with the Disability Discrimination Act 2005 and reflect the principles outlined under Regulation 13 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013.

Energy Efficient Buildings

- 4.70 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). A Statement on Energy has been prepared by KJ Tait and is included within the planning submission. This sets out the proposed LZCGT proposed within the development.
- 4.71 The site will be fully electric, and heating will be supplied via direct electric heaters and Air Source Heat Pumps (ASHPs) will provide all Domestic Hot Water. Energy efficient lighting will be installed throughout the development, while 200m² of Photovoltaic (PV) panels will be installed at roof level. Modelling estimates that the proposed PV panels will be capable of generating around 21,640 kWh of electricity per year. Please refer to this report for further details.

Development on Brownfield Land and Contaminated Sites

- 4.72 The site comprises a brownfield site which is currently occupied by an office building, although the applicant has proved evidence that the office is largely empty, and they are unable to attract long-term tenants. A Stage 1 Desk Study Site Investigation has been prepared by Woolgar Hunter to

assess the ground conditions at the site. Please refer to this for a detailed assessment of the ground conditions at the site.

Building Materials

- 4.73 The proposed development has been designed following detailed site analysis and consideration of the site's context to ensure that the proposed development respects its surroundings, as detailed within the Design and Access Statement. SG1 sets out the development proposals should respond to their context and reflect local character, history, and identity of their surrounding and materials.
- 4.74 SG1 sets out that the development should reflect a high-quality contemporary design that is innovative, imaginative and has evolved from its context yet also displays its own identifiable character. SG1 further states that development proposals should, wherever possible, lead and innovate rather than imitate or follow. Excellent architecture should be integral to all development schemes.
- 4.75 The materials have been selected to reflect the numerous sandstone buildings which form the prominent townscape feature in the surrounding area, to ensure the new building is sympathetic to the surrounding listed buildings and conservation area. The proposal will incorporate a sandstone façade which will follow street aesthetics, with a rusticated finish on the lower floors and an ashlar finish on the upper floors. The upper floors will also be set back slightly from the street elevation. The roof is proposed to comprise a standing seam metal roof with seam feature dormers.
- 4.76 For full details of the proposed design and materials, please refer to the architectural plans and Design and Access Statement which accompanies the application.

Daylight and Privacy

- 4.77 SG1 states that residential layouts should take a design-led approach towards aspect and orientation to maximise daylight and sunlight, reduce energy use, and prevent overlooking and loss of privacy.
- 4.78 A detailed Daylight and Sunlight Assessment has been undertaken by GIA to assess the daylight levels within the proposed apartments in accordance with BRE guidance. Please refer to this for full details of the analysis and results.

Aspect

- 4.79 SG1 states that ideally all flats should have dual aspect. Where single aspect is proposed, developers will require to show that the amenity enjoyed by flats is similar, if not better than that of dual aspect flats in a similar location. This includes considerations of the flat's outlooks.
- 4.80 The proposed development comprises 147 student rooms ranging in size from 18.1sqm to 42.3sqm. 146 of these are proposed as studio flats, with one accessible apartment. Studios located on the

northeast corner of the building at floors 01-06 dual aspect. All units will have open plan design and generous glazed openings to ensure the maximum daylight is received to each unit, and as noted above the proposed development will provide best practice daylight levels within the proposed development.

- 4.81 The proposed development also incorporates generous internal and external amenity space. 213 sqm of external amenity space (at level 00 and 06) will be provided in the form of a landscaped amenity deck and communal terraces. 525 sqm internal amenity space (at basement level and level 00) will be provided to include a gaming room, gym, study areas and breakout spaces.
- 4.82 In accordance with SG1, it is therefore considered that the proposed single aspect flats will therefore have at least similar if not better, amenity in comparison with that of dual aspect flats.

Waste Storage, Recycling & Collection

- 4.83 The guidance states that all new developments must include appropriate and well-designed provision for waste storage, recycling and collection which meets the city's wider placemaking objectives. All waste/recycling areas must be located discreetly, so as to have no adverse visual impact or cause traffic/noise nuisance to neighbours. Applicants must provide full details of the provision for waste storage, recycling and collection in the initial submission for planning permission.
- 4.84 The proposed development incorporates appropriate waste storage facilities located within the basement floor of the building and will be accessible from West George Lane. Staff will take refuse from the waste storage area to the main collection point. Details of the waste collection strategy will be agreed with Glasgow City Council in due course. Please refer to the architectural drawings which accompany the application for further details.
- 4.85 Overall, the proposed development meets the requirements of CDP1 and the associated Supplementary Guidance.

CDP2: Sustainable Spatial Strategy

- 4.86 CDP2 states that the council will continue to focus on the regeneration of the existing urban area to create a sustainable City. In doing so, the council will support new development proposals that utilise brownfield sites in preference to greenfield sites. Policy CDP2 also supports new development which supports higher residential densities in sustainable locations.
- 4.87 The City Centre Strategic Development Framework (SDF) was approved in May 2021. The SDF sets out a radical vision for the future evolution of Glasgow City Centre over the next 30 years (to 2050), and outlines measures to make the City Centre a more attractive and sustainable place to live, work and play.

4.88 The City Centre SDF proposes a number of strategic interventions under the four themes of the City Development Plan (CDP); to make the centre more Vibrant, Liveable, Connected and Green and Resilient. The SDF proposes six Strategic Place Ambitions in response to priority issues raised by city stakeholders for the improvement of the City Centre, one of which seeks to:

- Re-populate the Centre and improve liveability to ensure sustainable neighbourhoods that promote health, wellbeing and social cohesion;
- Reduce traffic dominance and create a pedestrian and cycle friendly centre, with improved public transport, that is healthier and cleaner;
- Green the Centre and make it climate resilient with a network of high-quality public spaces and green-blue infrastructure that caters for a variety of human and climatic needs; and
- Reinforce the Centre's economic competitiveness by providing much-needed accommodation for students at Glasgow's growing and economically important tertiary education sector, much of which is located in the city centre.

4.89 The Spatial Design Strategy outlined within the SDF aims to create a sustainable, liveable city centre which seeks to promote city centre living within sustainable 20-minute communities; enhance the distinctive and historic townscape of the City Centre; and ensure densification is sustainable and facilitates the repair of the urban townscape. This approach reflects the City Development Plan's (2017) strategic outcome of 'a thriving and sustainable place to live and work.'

4.90 The proposed development meets the ambitions of Policy CDP2 and the City Centre SDF to grow the population within the City Centre by redeveloping an underused brownfield site within the city centre to provide a high density, vibrant PBSA development within a sustainable city centre location, close to a variety of public transport facilities and wider amenities. The proposed student development also seeks to diversify the available housing supply within the city centre.

4.91 The proposed development will be entirely car-free, promoting the use of sustainable and active transport over private car use for future residents. The proposed redevelopment from office to student residential use will increase footfall along West George Street and surrounding roads, particularly during the evenings and weekends in an area which is presently dominated by office and hotel accommodation. This will result in increased vitality, safety and viability of the wider area through the provision of passive surveillance. The increase in the resident population will promote the diversification of uses in the area and supports the future prosperity and resilience of the surrounding area.

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- 4.92 The proposed development is therefore in compliance with the requirements of CDP2 and relevant Strategic Development Frameworks which cover the site.

CDP3 and IPG3: Economic Development

- 4.93 Policy CDP3 (Economic Development) aims to promote the creation of economic opportunity for all the city's residents and businesses and encourage sustained economic growth. The policy states that the associated Glasgow City Council Strategic Plan outlines that to create a resilient and growing city economy, one of the key aims is to improve the supply of good quality and sustainable housing for the city.
- 4.94 The site is located within the wider City Centre Strategic Economic Investment Location (SEIL). These locations are considered vital in delivering economic development in the key sectors identified by the Scottish Government, which include food & drink, financial & business services, life sciences, energy, tourism and creative industries sectors. CDP 3 acknowledges that the city centre is also a key location for a wealth of retail, commercial, leisure and higher educational uses, all of which create jobs, attract inward investment and provide important economic benefits through agglomeration and clustering.
- 4.95 The criteria to be met by development proposals, as prescribed under policy CDP 3 are outlined below. The applicant's response to the relevant criteria only, as outlined in blue.

1. Promote economic growth by:

- a. directing development in the GEL key growth sectors to the River Clyde Development Corridor and the City's Strategic Economic Investment Locations (SEILs);

The proposed development does not form part of a GEL key growth corridor. However, the proposed student residential uses will support the growth of Glasgow's Higher and Further Education Institutions and is therefore in compliance with the principles set out in CDP3.

- b. Directing industry and business uses to the city's Economic Development Areas (see Policy and Proposals Map) and safeguarding the City's SEILs and Areas of City-Wide Economic Importance for these uses;

As above.

- c. Supporting investment in new infrastructure and environmental improvements to unlock the development potential of constrained Economic Development locations including through the use of planning agreements;

The proposed development will result in the creation of a high quality PBSA development within an underused and partially vacant brownfield site, sustainably located within Glasgow City Centre.

- d. Supporting and encouraging existing employment-generating business and industry;

The proposed development will stimulate the local construction industry, creating jobs and economic activity.

A Socio-Economic Benefits Infographic has been prepared by Icen Projects to accompany the application for planning permission. The construction phase will support around 721 construction workers (direct, indirect and included), and will generate a total of £92m GVA per annum (direct, indirect and included). The occupation phase will also provide approx. 7 direct FTE jobs on site (direct and indirect). The student population would contribute to the city's economy by increasing footfall and local spending of £1.8m per academic year, and a total of £700k GVA per annum (direct and indirect). Moreover, there will be wider social and economic benefits including helping to repopulate Glasgow City Centre in line with the Council's aspirations, relieving rental pressure in the city centre and utilising low carbon technologies on site.

2. Promote Glasgow as a Learning City by supporting the growth of Higher and Further Education Institutions and other training opportunities;

The proposed development will provide purpose built student accommodation for 147 students within Glasgow. This will support Glasgow's Higher and Further Education Institutions and is therefore in compliance with the principles set out in CDP3.

3. Ensure Glasgow's town centres are vibrant places, in which to live and work by:

- a. Reinforcing the role of Glasgow City Centre as the primary location within the city-Region for retail, employment, leisure, tourism and evening economy uses;

The proposed PBSA development will fulfil a policy desire within the Council to increase the residential population in the city centre, as outlined in the City Centre Strategy (2014 – 2024) and the City Centre Strategic Development Framework (2021). This will ensure there is activity and footfall in the evening, as the site lies within easy walking distance of the majority of Glasgow's main City Centre entertainment and leisure venues. This will allow future student residents to support existing city centre uses by increasing local spending.

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- b. Supporting the creation of employment opportunities within the City's town centres, in accordance with Policy CDP4: Network of Centres and Supplementary Guidance;

The proposals will generate a number of job opportunities via staffing and maintenance of the completed student accommodation. The increase in resident population will also increase local spending within the surrounding areas to benefit the city as outlined under criterion 1(d) above.

4. Ensure the City has an adequate range of marketable sites to meet the current and future needs of incoming and existing business;

The resultant benefits of increasing the residential population in the city centre is an important policy aspiration for the city and the site is currently significantly underused.

5. Support and improve the City's energy, transport and digital infrastructure; and

The proposals represent a high-quality student accommodation development in a sustainable location close to a variety of public transport nodes and local amenities. 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) which seek to reduce carbon emissions. For full details of the sustainability credentials for the development please refer to the Statement on Energy prepared by KJ Tait and submitted in support of the application.

- 4.96 Residential living is being encouraged by the City Centre Strategy 2014-2019 and the Glasgow City Council Strategic Plan as noted within policy CDP3. Student accommodation use was also highlighted as an appropriate use during the online public consultation and during the extensive pre-application meetings held with GCC officers. The proposed development is considered to be in accordance with the requirements of policy CDP3.

CDP5 and SG5: Resource Management

- 4.97 SG5 sets out that the Scottish Government has ambition targets for reducing energy consumption and increasing energy use from renewable sources. To contribute to the achievement of the Scottish Government's targets, the Council is seeking to reduce energy consumption and utilise cleaner and more renewable sources of energy.

- 4.98 The Council also aims to ensure that buildings in new development are designed and constructed to be energy efficient and make use of low and zero carbon generating technologies.

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- 4.99 Policy CDP5 states that all new development must include appropriate and well-designed provision for waste storage, recycling and collection and should also be designed to reduce the need for energy from the onset. This should be done through careful siting, layout and design and should make the best use of energy efficiency techniques and materials to drive down energy consumption within the building over its lifespan. The proposed development incorporates appropriate waste storage facilities located within the basement floor of the building and will be accessible from the lane at the southern boundary of the site. Staff will take refuse from the waste storage area to the main collection point. Details of the waste collection strategy will be agreed with Glasgow City Council.
- 4.100 Policy CDP5 states that new buildings should include low and zero-carbon generating technologies to offset a proportion of emissions arising from the use of the buildings. In line with Policy CDP5, 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).
- 4.101 Within the proposed development, consideration has been given on site to low or zero carbon generating technologies (LZCGT), with the proposal site being fully electric, with heating supplied via direct electric heaters. Air Source Heat Pumps (ASHPs) will provide all Domestic Hot Water. ASHPs were chosen to provide DHW as they will offer an increased energy efficiency over the technologies and a reduction in CO₂ production. ASHPs (for DHW) were found to produce around 6.28 tonnes of CO₂ per year. By comparison, Point of Use electric water heating would produce around 27.15 tonnes, an increase of 76.87%. U-Values for all fabric elements will be lower than the Section 6 Maximum U-Values.
- 4.102 It is therefore concluded that the proposed development complies with the Gold Hybrid (Option 1) requirements of Policy CDP 5. For full details of the sustainability credentials for the development please refer to the Statement on Energy prepared by KJ Tait and submitted in support of the application.

CDP8 and SG: Water Environment

- 4.103 Policy CDP8 requires applicants to demonstrate that new development proposals contribute towards minimising flood risk, avoiding any increased risk of flooding within or out with the development site and avoid any increase in the quantity and rate of surface water run-off from any site.
- 4.104 According to SEPA Flood Maps, the site is not at risk of flooding from river, surface water or coastal flooding sources.
- 4.105 SG8 sets out the requirement for a surface water drainage strategy to be prepared for any new development of 5 or more dwellings. The SG lists requirements which must be covered by the drainage strategy, for example, the percentage of permeable area within the development, the

network / waterbody to which surface water will be discharged, water quality treatment requirements etc. The Drainage Strategy prepared by Woolgar Hunter has been developed with reference to Glasgow City Council's Sustainable Drainage Systems (SUDS) Design Criteria Guidance Note.

- 4.106 The proposed surface water drainage will utilise various forms of source control, coupled with a mix of above and below ground SUDS features to treat and convey surface water, prior to discharge to the combined sewer network, subject to Scottish Water approval. It is proposed that attenuated surface water is discharged at a controlled rate to the existing combined sewer network, subject to Scottish Water approval. Foul flows from the development will discharge to the existing combined sewer network, subject to Scottish Water approval.
- 4.107 A Drainage Strategy has been prepared by Woolgar Hunter to demonstrate that the application accords with the requirements of policy CDP8 and SG8. Please refer to this report for full details.

CDP9 and SG9: Historic Environment

- 4.108 Policy CDP9 Historic Environment aims to ensure the appropriate protection, enhancement and management of Glasgow's heritage assets by providing clear guidance to applicants. The Council will assess the impact of proposed developments and support high quality design that respects and complements the character and appearance of the historic environment and the special architectural or historic interest of its listed buildings and conservation areas. The Council is unlikely to support developments that would have a negative impact on the historic environment.
- 4.109 As noted within this Statement, the site is a non-designated building, but is located within the District and Blythwood Character Area of the Central Conservation Area. 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. The provisions of CDP9 therefore apply.
- 4.110 SG9 provides guidance for the demolition of unlisted buildings in Conservation Areas. Paragraph 2.108 of SG9 states that proposals for the demolition of an unlisted building, which contributes to the character or appearance of a Conservation Area, will require to demonstrate the following:
- a) The existing building is incapable of viable repair and re-use; and
 - b) The proposed replacement will preserve or enhance the character of the conservation area.
- 4.111 The accompanying HTVIA prepared by Icen Projects provides detailed analysis to demonstrate that the existing building at 249 West Geroge Street is not of townscape value (and therefore does not contribute to the character or appearance of the Conservation Area), and that the demolition would accord with both national and local planning policy for the following key reasons:

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- In terms of the appraisal of the existing building, the site is an unlisted building located within the Glasgow Central Conservation Area. 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. The building was therefore not highlighted as a building of special interest or townscape quality.
 - Additionally, the site was considered for listing by HES in 2012, however it was not considered the building met the criteria to qualify as a building of special or architectural interest and was therefore not listed.
 - In terms of the existing buildings contribution to the Conservation Area, the site is surrounded by listed buildings and is located on a prominent corner site. However, the building is not original to the Georgian 19th century Blythwood Square development. The Georgian building on the site was demolished in 1970 to make way for the existing building, and therefore the existing building is incongruous to the character of Blythwood Square. Therefore, it is concluded within the HTVIA that no townscape value can be attached to the existing building, in terms of the original design, intention, association or historic character for the laying out of Blythwood Square. The demolition of the building and principle of the erection of a considered new building on the Site, would have a neutral effect upon the key characteristics that define the character of the Conservation Area at Blythwood Square.
 - The building comprises a six storey reinforced concrete frame, carried on reinforced concrete pads, with sandstone cladding panels attached on the principal elevations. As detailed within the supporting information submitted along with the applications for Planning Permission and Conservation Area Consent, there is a record of ongoing maintenance issues with the cladding panels, which are likely to be a maintenance liability. The HTVIA notes that the Council are placing a value upon the visual appearance of the two principal elevations and the contribution they make visually to the overall streetscape. The Structural Survey prepared by Woolgar Hunter demonstrates that there are inherent problems with the construction and overall detail design of the building, in particular (from a townscape perspective) the sandstone cladding, which was likely to have been chosen as a finishing effect to complement the sandstone used for the construction of the original Blythwood Square terraces. Therefore, in terms of design and materials, the Site does not contribute positively to the character of the conservation area or have townscape value due to the poor condition of the exterior, and as a building that is failing.

4.112 The HTVIA concludes that overall, its loss would not have a detrimental effect upon the character of the conservation area. Accordingly, based on the evidence outlined within the HTIVA, the second part of the policy test outlined in SG9 does not apply. Notwithstanding, a Structural Survey has been undertaken by Woolgar Hunter and an assessment of whether the existing building is capable of

‘viable repair and re-use’ has been undertaken. This demonstrates that refurbishment/adaptation is not viable and is submitted as part of this planning application. Please refer to this Report for full details.

- 4.113 Additionally, the proposed new building has been designed and refined through an extensive series of pre application meetings with Glasgow City Council, and with significant reference to the heritage related to Blythswood Square and the former building that was onsite prior to the existing building.
- 4.114 Analysis presented within the HTVIA demonstrates that the proposed building would be sympathetic to the settings of the surrounding heritage assets and remains contextual and will contribute to local distinctiveness. A visual assessment has also been undertaken which demonstrates that the proposals are anticipated to have beneficial, neutral or negligible effect on the character of Blythswood Square or the surrounding townscape. The HTVIA states that overall, the proposed new building represents a contemporary addition to, and insertion into the conservation area, that will have a positive effect on the surrounding area, in accordance with the requirements of SG9. For a full analysis, please refer to the HTVIA submitted as part of this planning application.
- 4.115 The proposed development has been designed following detailed contextual analysis, as set out within the Design and Access Statement. In accordance with the requirements of CDP9, the proposed development design will respect the surrounding listed buildings and enhance the wider conservation area through investment and high-quality design. In accordance with the requirements of CDP9 and the associated SG9, the proposed development design will respect and enhance the surrounding listed buildings and Conservation Area through investment and high-quality design. The proposed development will enhance the appearance and amenity of the wider area by bringing an underused brownfield site into active use, through the provision of a high quality PBSA development in a sustainable city centre location.

CDP10: Meeting Housing Needs

- 4.116 CDP10 aims to ensure that the city’s growing and diverse population has access to a choice of housing of appropriate quality and affordability across all tenures. The Guidance states that the Council will, subject to compliance with other policies in the City Development Plan, generally support purpose-built student accommodation which achieves a high standard of amenity and an appropriate range of accommodation.
- 4.117 Detailed guidance on the development of student accommodation is provided in Section 2 (Student Accommodation) of SG10 (Meeting Housing Needs). This Supplementary Guidance seeks to ensure the provision of high-quality student accommodation in appropriate locations whilst protecting the character and amenity of the existing areas. SG10 applies to all types of student accommodation, including new build, change of use and conversion.

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- 4.118 Purpose-built student accommodation (PBSA) developments are expected to provide students with high-quality accommodation which provides on-site amenity spaces and communal facilities. Similarly, the Council expects that student accommodation is designed to benefit its surroundings through enhancements to the public realm and public space which are accessible to the wider community.
- 4.119 The proposed development will create a high-quality residential building for students and will offer a large number of communal amenities, including private gym, cinema room, a games room, study space and lounge and kitchen areas. It will also offer external amenity spaces through the creation of an external courtyard at ground floor level and an outdoor terrace at sixth floor level. Overall, a total of 738sqm of amenity space is proposed, which is in excess of the 5sqm per bed policy requirement for PBSA development in the city.
- 4.120 SG10 also sets out specific requirements for new PBSA development in relation to locational criteria, design criteria, amenity criteria, space standards, management and security criteria, and statement of need. We set out how the development responds to each of these points below.
- 4.121 **Locational Criteria:** *High-quality purpose-built student accommodation that is appropriately located can make a positive contribution to the local environment. Applicants will be required to prepare an analysis of the locality to demonstrate to what extent these characteristics exist.*
- 4.122 The application site falls outside the areas of over concentration of student residences defined in SG10. In principle therefore, there is no recognised over provision of student accommodation within the application site locality.
- 4.123 Research presented in the submitted PBSA Need and Demand Study demonstrates that in total, there are just under 20,000 bedspaces in specialist student accommodation in Glasgow of which around 45% is within one mile of the application site. However, this is clustered around High Street and Cowcaddens area rather than immediately surrounding the proposed site. The proposed site is therefore unlikely to lead to an overconcentration of student housing in this part of the city.
- 4.124 Please refer to the submitted Student Accommodation Need and Demand Assessment prepared by Icen Projects for more detailed analysis.
- 4.125 **City-Wide Locational Criteria:** *The Council expects PBSA to be in locations with good access to university and college facilities by active travel routes and / or public transport and where the development:*

- a) *Will not undermine the character and amenity of the surrounding area;*

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- b) *Has good access to shops, services, healthcare, leisure and community facilities; and*
- c) *Will not place unsustainable pressure on local amenities and facilities due to the density of accommodation proposed.*
- 4.126 The application site benefits from excellent public transport links to each of Glasgow's Higher Education institutions. In addition, the site is located less than 1 mile from the University of Strathclyde, Glasgow Caledonian University, Glasgow School of Art, and Royal Conservatoire of Scotland campuses, and just 1.1 miles from the University of Glasgow Gilmorehill Campus. The site is therefore highly accessible by active travel modes (walking, wheeling and cycling).
- 4.127 As previously demonstrated, the site is not located within an identified area of overconcentration so the proposals will not undermine the character and amenity of the surrounding area. The site's City Centre location also ensures it is within close proximity to all required amenities and will not place unsustainable pressure on local facilities.
- 4.128 ***Design Criteria:*** *The design of purpose built student accommodation must respond to its local context and every effort should be made to integrate the layout and building design into the surrounding community. It should also enhance the quality of the area. Proposals shall incorporate:*
- a) *Ground floor uses which are open to all members of the public, such as cafes and other footfall generating uses, subject to the nature of the local environment;*
- b) *The provision of publicly usable open space, taking the form of enhanced public realm, civic space or parkland;*
- c) *Built form that is sensitive to the local architectural vernacular and heritage in terms of the arrangement of buildings, their design, height, massing, and materiality;*
- d) *High-density or high-rise developments will only be acceptable in locations where they are compatible with the existing townscape;*
- e) *Utilising a whole life approach with flexible floorplates and building design to ensure there is scope and flexibility for adaptation to alternative future uses (which would be subject to permission).*
- 4.129 In response to criterion (a), ground floor uses that are open to members of the public are not included within the proposal. The primary entrance to the building is at ground floor level, which is required for reception and front of house services associated with the PBSA use. It was not considered that the basement level would be appropriate for publicly accessible uses and given the scale of the development the basement is required to meet the amenity space requirements, plant space and bike storage.
- 4.130 The existing building comprises underused office space and the proposed new PBSA use will provide an active frontage on to West George Street and Blythswood Street and will ensure there is activity
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throughout the day and night. Additionally, passive surveillance onto the street will be provided from the building and from the communal and private terraces at level 05 and 06.

- 4.131 The PBSA reception and associated amenity space is proposed at ground floor which will again serve to create activity at street level and further activate the frontage. In this way, it is considered the proposed development will also contribute to the public realm along this stretch of West George Street.
- 4.132 As detailed elsewhere within this Statement, care has been taken during the design process to ensure that the building responds positively to the established surrounding townscape in terms of height, massing, scale and materials. The adjacent Category B listed buildings have also informed the design and it is considered the proposed massing will serve to complement these buildings. The proposed building has also been designed to offer flexible floor plates which would be capable of adaptation to suit alternative uses in the future, if required. This represents a significant improvement on the adaptability of the current building on the site, which has significant issues in terms of reconfiguration due to the unusual L-shaped floor area and positioning of internal support structures.
- 4.133 ***Amenity Criteria:*** *It is imperative that the amenity of student accommodation meets the needs of its users. While the average length of stay is generally shorter than for mainstream residential with a greater emphasis on shared amenity, this should not form a justification for an unacceptably reduced level of quality in individual living accommodation. Proposals must demonstrate that:*
- a) Depending on the size of the proposal, it provides a mix of accommodation types to meet the varying needs of students including cluster flats, studio accommodation and, where required, family accommodation with appropriate segregation between occupation types;*
 - b) It will offer suitable, high quality communal facilities, amenity and social spaces along with adequate refuse and recycling facilities as set out in SG1 Placemaking.*
- 4.134 The proposed development is 147 student rooms ranging in size from 18.1sqm to 42.3sqm. A total of 6 of those rooms are proposed to be fully accessible. This provides a range of unit types to meet varying needs of students.
- 4.135 Amenity standards for flatted dwellings, as set out in IPG6 Greenspace and Green Network, will be applied to student accommodation developments. This equates to 5sqm per bed, which based on the proposed 147 rooms, would be 735sqm of amenity space in total. The proposed development will provide 738sqm of amenity space – exceeding the minimum required standard.
- 4.136 As previously noted, the development will contain a range of internal, communal amenity facilities including, private gym, cinema rooms, games room, study space, lounge areas and kitchen.

4.137 **Space Standards:** *The Council recognises that PBSA is delivered primarily by private sector commercial developers. The Council aims to ensure that developers provide a reasonable standard of amenity with respect to minimum room sizes. To achieve this, it is expected that no accommodation will fall below the following space standards:*

- a) *Study bedroom without ensuite: 10m²*
- b) *Study bedroom with ensuite: 13m²*
- c) *Studio room for one student with ensuite bathroom and kitchen: 18 m²*

4.138 As noted above, all 147 student rooms will range in size from 18.1sqm to 43.2sqm. The proposed development therefore exceeds the minimum size of room as required by the guidance.

4.139 **Management & Security Criteria:** *Applications should be supported by a Management and Security Strategy which details:*

- a) *The general operations and maintenance of the building and site;*
- b) *Consideration of how the impacts of conduct of occupants will be managed;*
- c) *Detail of onsite security arrangements for all developments. Larger developments should detail how they will maintain a 24/hour staffing element;*
- d) *Planned arrangements for the management of waste and how waste management facilities will be provided onsite, in accordance with the requirements in SG1: Placemaking;*
- e) *Consideration for arrangements for the moving in and moving out of occupants;*
- f) *Consideration of arrangements to ensure the well-being of residents; and*
- g) *Evidence of accreditation with relevant bodies such as The Accreditation Network UK/Unipol Code of Standards for Larger Developments not managed or controlled by Educational Establishments.*

4.140 The design of the building has been carefully considered and will ensure that the development will operate efficiently and in compliance with industry standards. A reception area is proposed at ground floor level, with back-of-house staff facilities provided within the basement, to support a 24-hour element of on-site staff who will manage the operation and security of the development.

4.141 There is a dedicated refuse and waste store located at ground floor, with a dedicated and direct access onto George Street Lane. This will allow the site to be adequately serviced.

4.142 Ample amenity space and facilities are also proposed, in excess of minimum standards, to ensure that a good standard of amenity and wellbeing of residents will be achievable.

4.143 The site, once operational, will be managed by a specialist student accommodation operator who will have a detailed management strategy in place to ensure the development is managed in accordance with requirements. In accordance with the policy requirements, a high level Management and Security Strategy has been prepared by Icen Projects to support the application, please refer to this for full details.

4.144 **Statement of Need:** *It is important that new student accommodation proposals do not lead to an oversupply which could lead to under-performing or vacant accommodation. Therefore, applicants will be required to provide a Statement of Need covering the following aspects:*

- a) *Evidence of the specific need for PBSA being addressed locally and at city-wide scale;*
- b) *Information about prospective occupiers including academic status, any specific household requirements or accommodation needs and where appropriate the type of existing accommodation the potential student occupiers are likely to be drawn from;*
- c) *A recorded increase in student numbers;*
- d) *Institutional funding available to deliver the proposal; and*
- e) *University or College support for the proposal.*

4.145 A Student Accommodation Needs and Demand Assessment (SNDA) has been prepared by Icen Projects and is submitted in support of the application, which clearly demonstrates the current and expected future pressures on the supply of purpose built student accommodation within the city, with demand currently significantly outweighing supply. It therefore provides a strong evidence base supporting the need for the proposed PBSA development. Please refer to the SNDA for commentary on how the proposed development responds to the above criteria.

CDP11 & SG11: Sustainable Transport

4.146 **CDP 11 (Sustainable Transport)** aims to ensure that Glasgow is a connected city, characterised by sustainable and active travel by supporting better connectivity by public transport, discouraging non-essential car journeys, encouraging opportunities for active travel, reducing pollution and other negative effects associated with vehicular travel and optimising the sustainable use of transport infrastructure.

4.147 In relation to new developments, Policy CDP11 states that the Council will direct major development to locations well served by existing public transport services and active travel routes. New

development should be designed at densities appropriate to maintain and/or extend public transport services whilst taking into account local context and other requirements.

- 4.148 The site is located within the City Centre and within an area of high public transport accessibility as defined by Policy CDP11. There are a number of public transport facilities located within the immediate vicinity of the site including Charing Cross Rail Station, Buchanan Street and Cowcaddens Subway and Glasgow Central Rail Station. There are a small number of bus stops located on West George Street, with several more stops and a greater number of services within a 5-minute walk, along Sauchiehall Street, Bath Street, Hope Street and Renfield Street. The proposed development is considered to accord with the aims of CDP11 which seeks to direct major development to locations well served by existing public transport services. The proposed development is also car-free, which is considered acceptable given the highly sustainable city-centre location of the development site.
- 4.149 For full details of the accessibility of the site in terms of public transport, please refer to the Transport Statement prepared by Kelvin Clarke which accompanies this application.
- 4.150 Cycle parking will be provided within the proposed development, in a safe, secure and fully internal compound provided at basement floor level. This will further reduce the number of vehicle trips to / from the site and will encourage more sustainable patterns of transport. The proposal incorporates the provision in the basement for 75 Indoor secure cycle stores based on principles of standard bikes, which exceeds the minimum standards set out by the Guidance.

Development Plan Conclusions

- 4.151 As stipulated by Section 25 of the Town and Country Planning (Scotland) Act 1997 (as amended) this section of the Planning Statement has addressed the planning application against the Development Plan.
- 4.152 In summary, it is considered that the proposed scale, design, and massing complies with the City Development Plan and the supplementary guidance. The proposed development would significantly enhance the site and appearance of the Central Conservation Area. This assessment, with reference to the suite of supporting documentation which accompanies the application, has demonstrated the proposal's accordance with the Development Plan.
- 4.153 As a result, the application should be granted planning permission unless material considerations indicate otherwise. We consider the proposal in the context of relevant material considerations in the following section.

5. MATERIAL CONSIDERATIONS

Glasgow City Centre Living Strategy

- 5.1 The Glasgow City Centre Living Strategy ('the CCLS') was approved in 2020. It aims to enable a sustainable, inclusive and diverse city centre population.
- 5.2 The CCLS aims to double the city centre residential population to 40,000 by 2035 by supporting and enabling city centre living.
- 5.3 The proposed development would facilitate the densification of the city centre and increase levels of city centre living. The CCLS notes Glasgow is one of the top 50 global city for students worldwide and aims to widen the demographic profile of the city centre, ideally attracting families as well as continuing to attract students.
- 5.4 The proposed development seeks to create student accommodation within the city centre, in an area of High Accessibility with all amenities available within a 20-minute walk.
- 5.5 Considering, the above, the proposed development will contribute significantly towards meeting the aims of the City Centre Living Strategy and widen the demographic of the city centre.

6. STATEMENT OF COMMUNITY BENEFIT

- 6.1 A full review of National Planning Framework 4 (NPF4) Policy is included in Section 4 of this Statement.
- 6.2 Criterion (c) of Policy 16 notes that development proposals for new homes that improve affordability and choice by being adaptable to changing and diverse needs, and which address identified gaps in provision, will be supported. This includes (vii) homes for people undertaking further and higher education. The proposed development comprises the creation of a 147 bed purpose built student accommodation (PBSA) development and therefore the application is required to be accompanied by a Statement of Community Benefit to comply with Policy 16 in respect of the proposals at 249 West George Street.

Statement of Community Benefit

- 6.3 The intention of **NPF4 Policy 16: Quality Homes** is focused on access to high quality, affordable and sustainable homes, in the right locations, providing choice across tenures that meet the diverse housing needs of people and communities across Scotland.
- 6.4 Development proposals that include 50 or more homes, and smaller developments if required by local policy or guidance, should be accompanied by a Statement of Community Benefit. The statement will explain the contribution of the proposed development to:
- i. Meeting local housing requirements, including affordable homes;
 - ii. Providing or enhancing local infrastructure, facilities, and services; and
 - iii. Improving the residential amenity of the surrounding area.
- 6.5 A response to each criterion is included below, explaining the contribution of the proposed PBSA development at 249 West George Street.

Meeting Local Housing Requirements

- 6.6 In conjunction with the Glasgow City Development Plan Policy 10 – Meeting Housing Needs and NPF4 Policy 16 – Quality Homes, the proposed development would assist in meeting local housing requirements by providing 147 student beds through the delivery of a new PBSA development within a sustainable City Centre location.
- 6.7 The proposal is for the demolition of the existing building and the redevelopment of the site to provide a high-quality, sustainable replacement. The current building is no longer suitable for its intended

use and as outlined within this Statement and the suite of supporting information submitted as part of the planning application, the building is not energy efficient and is incapable of being refurbished or adapted into productive use via commercially feasible means. This has been demonstrated by the Applicant's inability to establish traditional office tenancies for the property, as the existing building now falls far short of the requirements of modern office occupiers, particularly in regard to city centre Grade A space.

- 6.8 In line with the Council's ambitions to grow the population within the City Centre, the proposal will deliver on this aim by redeveloping an underused brownfield site within the city centre to provide a high density, vibrant PBSA development within a sustainable city centre location, close to a variety of public transport facilities and wider amenities. The proposed student development also seeks to diversify the available housing supply within the city centre.
- 6.9 The proposal has taken a design-led approach that will create a successful place by delivering healthy, pleasant, distinctive, connected, sustainable and adaptable qualities.
- 6.10 The proposal is therefore considered acceptable in principle and would comply with the Development Plan in this respect.

Providing and Enhancing Local Infrastructure, Facilities and Services

- 6.11 The proposed PBSA development incorporates generous internal and external amenity space. 213 sqm of external amenity space (at level 00 and 06) will be provided in the form of a landscaped amenity deck and communal terraces. 525 sqm internal amenity space (at basement level and level 00) will be provided to include a gaming room, gym, study areas and breakout spaces.
- 6.12 As outlined within this Statement, there will be a number of resultant wider economic benefits associated with proposal. The headline economic benefits can be summarised as follows:

Construction Phase Benefits

- Injection of construction investment into the Local Area;
- 721 direct construction workers per annum over the 1.5 year construction phase (total);
- 1,088 indirect construction works (total across Scotland);
- £92m direct and indirect GVA investment.

Operational Phase Benefits

- 5 FTE direct jobs created on site;
- 2 indirect jobs created (total across Scotland);
- £1.8m student expenditure in the local economy per academic year;
- £700k direct and indirect GVA investment.

Wider Benefits

- The building will utilise low and zero carbon generating technologies;
- 75 indoor secure cycling spaces will be provided to increase sustainable travel modes;
- The proposal will help to deliver on Glasgow City Council's aspirations to repopulate the City Centre;
- The provision of additional PBSA beds will reducing pressure on the traditional housing market, particularly the rental market;
- Will include sustainable, inclusive wheelchair friendly design;
- Include market leading amenity facilities.

6.13 In addition to the redevelopment of an underused brownfield site into a sustainable development that will provide much needed high quality, energy efficient purpose built student accommodation, the proposal will bring forward other enhancements for the local area.

6.14 The highly accessible location supports the principles of local living and the 20 minute neighbourhood concept, with a range of local amenities including local retail, services, wider amenities and public transport all located within walking distance of the proposed development site.

Improving the Residential Amenity of the Surrounding Area

6.15 The existing building at 249 West George Street provides little contribution to the amenity of the surrounding area in its current form, given that is currently underused and largely vacant office space.

6.16 The proposed new PBSA use will provide an active frontage on to West George Street and Blythswood Street and will ensure there is activity throughout the day and night. Additionally, passive surveillance onto the street will be provided from the building and from the communal and private terraces at level 05 and 06.

6.17 The proposed development seeks to redevelop the existing office building at 249 West George Street- to provide a vibrant PBSA development within a sustainable city centre location, close to a variety of public transport facilities and wider amenities. The proposal will support the reinvention of this site by bringing a sufficient level of activity to the surrounding space throughout the day and night-time hours.

Summary

6.18 The proposed development will make a positive contribution to meeting local housing requirements through the provision of a high quality PBSA development, which will provide and enhance local infrastructure, facilities and services, and improve the residential amenity of the city centre.

7. CONCLUSION

- 7.1 The proposal is seeking full Planning Permission and Conservation Area Consent for *Demolition of existing building and erection of Purpose-Built Student Accommodation with associated amenity, access and other ancillary works* at 249 west George Street, Glasgow.
- 7.2 It will lead to the creation of a high quality PBSA development within a prominent location adjacent to Blythswood Square within Glasgow City Centre.
- 7.3 The design of the proposed development will fit comfortably with the character of the surrounding townscape, improve the vitality of the streetscape, and will serve to enhance the setting of nearby listed buildings and the wider Central Conservation Area.
- 7.4 Evidence has been submitted to demonstrate how this proposal will meet identified demand for PBSA development within Glasgow. This Statement has also set out why the proposed development is justified in locational terms, and how it will successfully integrate into the surrounding community.
- 7.5 Section 25 of the Town and Country Planning (Scotland) Act 1997 (as amended) dictates that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 7.6 This Planning Statement has demonstrated, through reference to the accompanying suite of supporting documents, that this application for planning permission is acceptable in the context of the Development Plan and relevant material considerations.
- 7.7 For the reasons outlined above, it is considered that a strong case has been presented in support of the proposed development and we would respectfully request that planning permission be granted.