

06 November 2023

Glasgow City Council  
Development and Regeneration Services  
231 George Street  
Glasgow  
G1 1RX

**CALTON**

PLANNING + DEVELOPMENT

15 Calton Road, Edinburgh, EH8 8DL

Dear Sirs

**PLANNING APPLICATION AND LISTED BUILDING CONSENT  
10 GORDON STREET, GLASGOW, G1 3PL  
ON BEHALF OF NATWEST PROPERTY SERVICES  
E:PLANNING REFERENCES: 100649355-001 & 100649357-001**

On behalf of Natwest Property Services, please find enclosed concurrent applications for planning and listed building consent for proposed works at the Royal Bank of Scotland branch at 10 Gordon Street, Glasgow. The proposals relate to external and internal works to provide a new accessible entrance and internal ramp into the branch. The descriptions of development are as follows:

Planning application:

*"External alterations to provide new accessible entrance".*

Listed Building Consent application:

*"Internal and external alterations to provide new accessible entrance (including internal access ramp) and internal refresh works".*

The submission of these applications follows initial pre-application advice with Alan Shand under pre-application advice reference: 23/01910/PRE.

**The site**

The application site comprises the existing Royal Bank of Scotland branch at 10 Gordon Street. The building is category A listed and lies within the Central Conservation Area. The proposal relates principally to alterations to the left hand entrance into the bank and internal alterations.

**Background**

NatWest is committed to making banking accessible to its customers, and as part of this, is implementing a range of measures to make its branches easier for everyone to access. Most NatWest/Royal Bank of Scotland (RBS) branches now have ramps or level access, automatic bi-folding power assisted doors, and accessible meeting rooms with access suitable for wheelchair users.

Currently, the Gordon Street branch is only accessible via stepped access and level access is required to ensure the branch aligns with the bank's commitment to improving accessibility for all customers.

### **Planning History**

The submission of these applications for an internal ramp solution follows previous proposals for an external access ramp which were not supported by Glasgow City Council. This includes the refusal of planning and listed building consent for an external ramp in 2015 (application references 14/02889/DC and 14/02890/DC) and more recently, pre-application feedback received in January 2023 relating to a revised external ramp solution (pre-application enquiry reference: 22/03217/PRE). The main reason for the Council not being able to support an external ramp solution related to the impact of the external ramp on pedestrian movement on Gordon Street.

### **The proposals**

Given previous proposals for an external ramp have not been supported, NatWest has been reviewing alternative solutions and are now proposing an internal ramp proposal.

In terms of alterations to the exterior of the building, the following alterations are proposed:

- Existing storm door and frame removed for relocation;
- Remove existing handrail. Make good effected sandstone;
- Remove existing (non-original) steps;
- Install new transom above newly lowered original storm door;
- Install new threshold and paving slabs to match existing.

As well as the above, the following internal alterations to the building are proposed through the listed building consent application:

- Remove non-original glazed internal lobby and door;
- Install new automatic telescopic sliding doors;
- Installation of new internal access ramp and stairs;
- Other internal branch refresh works.

Please refer to the Design and Access Statement submitted in support of the applications for more detail on the proposals.

### **Planning Policy Context and Assessment**

The development plan for the site comprises NPF4 and the Glasgow City Development Plan which was adopted in March 2017.

Within the City Development Plan, the application site at Gordon Street is identified as lying within the Central Strategic Economic Investment Location (SEIL), the City Centre Principal Retail and Commercial Area and the Central Conservation Area.

To achieve the Plan's key aim of creating and maintaining a high quality, healthy place, **Policy CDP 1: The Placemaking Principle**, is applied to all development proposals throughout the City. Policy CDP1 advises, inter alia, that new development is expected to be design-led to contribute towards making the city a better and healthier environment to live in and aspire towards the highest standards of design while protecting the City's heritage. The policy sets out a range of measures as to how this can be achieved and in doing so recognises the importance of meeting the needs of all members of society and creating more healthy and equitable environments.



Policy CDP1 is supported by **Supplementary Guidance SG1** which was adopted by the Council in October 2018. Part 1 of SG1 includes a placemaking toolkit to guide development in the City and identifies 6 Qualities of Place. Under Quality 'Legibility and Safety', the policy recognises that development proposals should give careful consideration to the needs of mobility and visually impaired users while under quality "Ease of Movement" it is further identified that development proposals should make or facilitate provision for the visually and mobility impaired to achieve the key principle that places should be accessible to everyone.

The proposals can draw support from policy CDP 1 and SG1 in terms of seeking to improve accessibility and inclusivity by providing disabled access into the branch.

**Policy CDP9 Historic Environment** and **SG9 Historic Environment** are also relevant and seek to preserve and protect the Historic Environment. Barrier free access to listed buildings is dealt with at paras 2.79 and 2.80 of the guidance. Para 2.79 states:

*"Under the 1995 Disability Discrimination Act, developers are required to consider incorporating barrier free access. Where alterations to provide access for disabled persons to buildings of historic or architectural importance are proposed, consideration must be given to the mitigation of any likely adverse impacts on the building."*

Para 2.80 advises that proposals for barrier free access should comply with the following:

*a) any access provisions will require to respect and preserve the historic environment;*

The proposals have been carefully and sensitively designed to respect the historic significance and character of the listed building. The new accessible entrance with an internal ramp solution results in minimal works to the exterior of the listed building and will have no adverse impact on the character or appearance of the conservation area. The internal access ramp and other refresh works respects the original layout and plan form of the building and will not result in the loss of historic fabric which contributes to the building's special interest.

*b) where alterations to a principal entrance to a building would be detrimental to the special architectural or historic interest of the building, alternative access arrangements should be considered;*

Accessible access into the building can only be provided from Gordon Street; no rear accessible access is possible. There are two existing entrances into the branch from Gordon Street. The proposals are to provide accessible access into the bank through the western entrance door only. The proposals will result in minimal works to the exterior of the building and as such will not be detrimental to the special architectural or historic interest of the building.

*c) a high standard of design and sensitive choice of materials, finishes and colours will be required in all cases;*

The Design Statement submitted with the application explains the proposals in greater detail and demonstrates that the proposals have been sensitively designed with materials and proposals designed to match and compliment existing finishes.

*d) applications for Planning Permission and Listed Building Consent should be accompanied by an Access Audit which makes an assessment of the access barriers outside and inside the building, together with proposals on how these barriers can be overcome without detriment to the historic building (see SG 1: The Placemaking Principle and refer also to the register of Access Consultants at [www.nrac.org.uk](http://www.nrac.org.uk)).*



An access audit is included within the Design, Heritage and access statement and has informed the design proposals.

On the basis of the above, the proposals are considered to accord fully with Policy CDP9 and SG9 Historic Environment.

Policy 7 of NPF4 relates to historic assets and places. Criterion c of the policy states that *“development proposals for the reuse, alteration or extension of a listed building will only be supported where they will preserve its character, special architectural or historic interest and setting.”* For the reasons stated above, the proposals are considered to accord fully with NPF4 policy 7c given they will preserve the building’s character, special architectural and historic interest.

### **Other material considerations**

Historic Environment Scotland’s Managing Change in the Historic Environment Guidance on Accessibility (October 2010) should also be considered in assessing the proposals. This identifies that *“equality of access for all people is a fundamental aim of the Scottish Ministers policy on the historic built environment”*. The Guidance also recognises that *“with careful thought and planning, improved physical access to most elements of the historic environment can usually be achieved through reasonable adjustments without harming the character and appearance of the historic building or place”*.

### **Planning and listed building consent content**

For clarity the planning and listed building consent applications comprise:

#### Planning Application (e:planning ref: 100649355-001)

- Completed on-line planning application form and associated owner certificates duly signed;
- The following application plans:
  - E7530-GA-LP-BP Location Plan;
  - E7530-24-D1 Rev A Section – entrance area existing/proposed level access
  - E7530-DM-E1 Elevation 1 – Proposed downtakings;
  - E7530-DM-GD Rev A Ground floor plan – Downtakings;
  - E7530-EX-E1 Elevation 1 As Existing
  - E7530-EX-GD Rev a Ground Floor Plan As Existing
  - E7530-GA-E1 Rev A Elevation 1 As Proposed
  - E7530-GA-GD Rev D Ground Floor Plan as Proposed NOT FOR PUBLIC
  - E7530-GA-GD Rev D Ground Floor Plan as Proposed PUBLIC
- Design, Heritage and Access Statement (incorporating Access Audit) prepared by Lewis & Hickey Architects.

The planning application is exempt from an application fee as it relates to a building which the public has access to and is for a proposed development to provide a means of access to the building for a disabled person.

#### Listed building consent Application (e:planning ref: 100649357-001)

- Completed on-line listed building application form and associated owner certificates duly signed
- Application plans as follows:
  - E7530-22-D1 Rev A Internal Elevations Proposed



- E7530-22-D3 Rev A Internal Elevations 3 Proposed
- E7530-24-D1 Rev A Section – entrance area existing/proposed level access
- E7530-DM-E1 Elevation 1 – Proposed downtakings;
- E7530-DM-GD Rev A Ground floor plan – Downtakings;
- E7530-EX-BA Basement Floor Plan As Existing NOT FOR PUBLIC
- E7530-EX-BA Basement Floor Plan As Existing PUBLIC
- E7530-EX-E1 Elevation 1 As Existing
- E7530-EX-GD Rev A Ground Floor Plan As Existing
- E7530-EX-MZ Rev A Mezzanine Floor As Existing
- E7530-GA-E1 Rev A Elevation 1 As Proposed
- E7530-GA-GD Rev D Ground Floor Plan as Proposed NOT FOR PUBLIC
- E7530-GA-GD Rev D Ground Floor Plan as Proposed PUBLIC

- Design, Heritage and Access Statement (incorporating Access Audit)

We trust that the planning and listed building consent applications can be registered at your earliest convenience. Should you require any further information, please do not hesitate to contact Caroline Nutsford on 07969 869 185 or email [caroline@caltonplanning.co.uk](mailto:caroline@caltonplanning.co.uk)

Yours faithfully



**Caroline Nutsford**  
**Director**  
**Calton Planning + Development**  
**For and on behalf of NatWest Property Services**