

SUPPORTING STATEMENT

**ERECTION OF FLUE STACK TO EXISTING
INDUSTRIAL BUILDING AND OTHER
EXTERNAL WORKS.**

**UNIT 9, OAKBANK TRADING ESTATE,
GARSCUBE ROAD, GLASGOW G20 7LU**

CHEMIFY

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Ryden

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INTRODUCTION AND CONTEXT

- 1.1 This Statement has been prepared by Ryden LLP on behalf Chemify, a chemical research organisation associated with the University of Glasgow. The business requires new lab and ancillary office space within Glasgow and has identified premises at Oakbank Trading Estate for that purpose.
- 1.2 It supports an application for Planning Permission relating to Unit 9 of Oakbank Trading Estate, which lies off Garscube Road and where the Applicant is proposing to occupy those existing premises for research and development purposes. The proposed use of the building is considered to fall within Class 4 of the Use Classes Order 2023.
- 1.3 Historically, this site was granted consent under ref: 19/01609/FUL for the use of industrial premises (Class 5) as storage and distribution (Class 6). It is unclear from our research, whether this consent has been implemented. If it was implemented the unit benefits from Class 6 consent and if not, it has Class 5. Regardless, both scenarios allow permitted change of use to Class 4 and that is the use under which Chemify proposes to operate. Accordingly, this submission does not relate to a material change of use and addresses only the proposed external works to the building and yard area.
- 1.4 The purpose of this document is: to provide details of the proposed use and site operations. It also considers planning policy and guidance relevant to the use at this location and offers a summary evaluation of the proposal against the background of the aforementioned planning policy regime.

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THE SITE AND PROPOSAL

SITE DESCRIPTION

- 2.1 The subject property is known as 9 Oakbank Trading Estate. It sits within a small trading estate located off the A81 Garscube Road. Those other units are occupied by a mix of employment uses (Classes 4/5/6). The wider locale comprises a mix of uses including other business and industrial occupiers with some high density residential located to the south-east on the opposite side of Garscube Road. The dominant land use in the immediate locale is business/industrial/commercial.
- 2.2 The site area (as shown within the location plan) is circa 0.17 hectares. This includes the subject property and its dedicated open storage yard.
- 2.3 The unit is accessed from the main internal estate access road which itself leads directly out onto Garscube Road.

THE PROPOSAL

- 2.4 The Applicant proposes to use the premises for Class 4 'Research and Development' Use and given the unit benefits from either Class 5 or 6 Use then we do not consider there is any material change of use proposed. As such, this application does not relate to a material Change of Use. There are other internal fit out works required but again, we do not consider that any of those works would require Planning Permission in this instance.
- 2.5 Against this background, we set out below what we believe are the proposed works which require consideration within this planning application.
 - Proposed flue stack (and associated/ancillary works).
 - Storage compound for chemical products within the open yard area.
 - New 2.4m high security fencing with sliding (6m wide) electric gate.
- 2.6 A pre-application enquiry was submitted in December 2023 (ref: 23/02979/PRE). That process concluded that the aspects of the proposals as described above are indeed those that should be the subject of a Planning Permission application. Moreover, it confirmed that those proposed works would not offend planning policy, albeit the drawing details were not provided.
- 2.7 A consultation response from Environmental Health confirmed that an Air Quality Assessment was not required given the volumes of solvents and gasses involved in the production of chemicals. Those quantities have not changed from the pre-application submission and as such we assume that this advice remains valid.

Operations

- 2.8 The operation proposed is a low volume chemical production facility. The scale of chemicals to be produced, based on current systems, range from 10's of milligrams to a maximum of 5 grams of product. The primary containment and protection for the chemists within the facility will be fume cupboards. These are continuous airflow cabinets in which all hazardous chemistry is carried out. They protect the user by having a constant flow of air into the cabinet, preventing any harmful vapours within the cabinet from escaping. They are also banded to capture any liquid spillages.
- 2.9 The quantity of vapour is extremely small and is diluted by many orders of magnitude as it passes through the air handling system before being expelled into the atmosphere via a flue stack. This is a standard method of containment used in all chemistry laboratories and uses well established technology.
- 2.10 A detailed specification sheet relating to fume emissions has been submitted with the application.

Flue stack and ancillary works

- 2.11 A flue stack is required to safely release emissions from the building. The location and extent of the flue is confirmed within the associated details drawing package. It is proposed to be located on the north elevation of the building and the height will be at 3m above the roof ridge of the existing building. Associated works include;
- Galvanised steel framed mezzanine deck (external) to support flue fans and stack with galvanised steel access stair to plant deck
 - Air supply duck from building (north elevation)
 - Air handling unit within the open yard area

Storage compound

- 2.12 It is also intended to utilise a proportion of the existing, dedicated open yard space to store a quantity of solvents, gasses and liquids used within the processing of chemicals. This will be in very low quantities and does not in our view, trigger a requirement for Hazardous Substances Consent. Moreover, the storage compound itself meets approved HSE standards.
- 2.13 The containerised storage compound is located against the north elevation of the building below the proposed flue stack.

Security fencing/gated access

- 2.14 A new section of 2.4m high security fencing with 6m wide electric gate will be erected to provide additional safety for the storage area. The scale, extent and design of that fencing is detailed within the supporting drawing package and will mirror the existing fencing on site.

Other ancillary works

- 2.15 The proposals also include creation of a dedicated EV charging bay within the storage area.
- 2.16 New waste and recycling facilities are proposed within the open yard alongside the proposed containerised storage area.
- 2.17 The proposal does not require new or altered access or drainage arrangements and will not create any new floorspace.

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PLANNING POLICY CONTEXT

- 3.1. In determining planning applications, the Town and Country Planning (Scotland) Act 1997, as amended, requires planning authorities to have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations (Section 37 of that Act). The development plan for the area comprises NPF4 February 2023 and the Glasgow City Development Plan, March 2017.

NPF4

- 3.2 On the basis that permission is not required for the proposed occupation and use of the building as proposed, there is limited planning policy analysis to consider.
- 3.3 [Policy 1 –Tackling the climate and nature crises](#) gives significant weight to the global climate and nature crises to ensure that it is recognised as a priority in all plans and decisions. It is to be applied together with the other policies in NPF4. [Policy 2 - Climate mitigation and adaption](#) states development proposals will be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible. [Policy 9 – Brownfield, vacant and derelict land and empty buildings](#) supports the sustainable reuse of brownfield land and buildings and to take into account biodiversity value of the land.
- 3.4 The development proposal is for the reuse of a vacant building, on brownfield land within an allocated employment site and therefore, is supported by the provisions of that policy. The current biodiversity value of the site is limited but the proposals will not alter or impact on existing landscaping and boundary treatment. Moreover, the site is located within an urban area, within and close to, established commercial and industrial development, as well as existing services and amenities and public transport connectivity. In this regard, it is considered to contribute positively to the provisions of Policies 1 and 2. Against this background, the proposals are also considered to comply with the provisions of [Policy 13 – Sustainable Transport](#).
- 3.5 [Policy 14 – Design](#), requires that development proposals are designed to improve the quality of an area regardless of scale. There is very limited impact resulting from the proposed use and associated works. The provision of a flue stack is appropriate for a building of this nature and it will be 3 m above roof ridge height. The other works proposed will be negligible from a design impact perspective. Indeed, the erection of additional security fencing may in reality improve the perception of this site by screening the existing open yard area.

- 3.6 **Policy 26 – Business and industry** confirms that proposals for business and industry uses on sites allocated for that purpose within the adopted LDP will be supported.

CITY DEVELOPMENT PLAN 2017

Key Aims of the Plan

- 3.7 The key aims of the City Development Plan (CDP) are “Creating and maintaining a high-quality healthy place” and “Developing a compact city form that supports sustainable development” (Page 17). The subject site is vacant and not currently in active economic use. It is considered to occupy a sustainable location where the principle of industrial use is appropriate. In this regard, the proposed development is in line with these CDP aims.

CDP Strategic Outcomes

- 3.8 The CDP ‘Strategic Outcomes’ provide a rationale for the CDP policies and proposals. A new employment use at Oakbank supports the plan’s objective for new investment and employment opportunities. Indeed, the redevelopment of a vacant and brownfield site as an economic development opportunity can seek to assist in this regard.
- 3.9 The proposed development will occupy a location which is accessible by sustainable means therefore supporting the strategic outcome with regard to active travel and public transport considerations.

CDP1 - The Placemaking Principle

- 3.10 Policy CDP 1 ‘Placemaking Principle’ is an overarching policy and seeks to improve the quality of development in Glasgow. It is underpinned by the six qualities of place as defined in Scottish Planning Policy and supported through SG01. The proposal represents a reuse of a vacant building and brownfield site. It is located within a well-established mixed use industrial and commercial location where it can benefit from existing transport connections and infrastructure.
- 3.11 Interim SG 1 ‘Placemaking’ (Part 2) contains detailed assessment criteria relating to physical design. The key focus for this development proposal is the ‘Development of Brownfield Sites’. In this regard, SG 1 states that Glasgow has consistently had the highest concentration of vacant and derelict land of any local authority in Scotland. To address this, GCC will engage with the private sector with the purpose of addressing the constraints to development of vacant and derelict sites. The proposed development site is brownfield and the existing building vacant. Its redevelopment will provide economic growth that is in line with the aims and objectives of CDP.

CDP2 - Sustainable Spatial Strategy

- 3.12 Policy CDP 2 'Sustainable Spatial Strategy' aims to help to ensure that the City is well-positioned to meet the challenges of a changing climate and economy, and to build a resilient physical and social environment which helps to attract and retain investment and promotes an improved quality of life.
- 3.13 The proposal is for the reuse of a vacant building on a brownfield site with a new employment use. At a strategic level, this is considered to be sustainable by re-using existing land and building and in doing so, delivering economic investment in the area.
- 3.14 Specifically, the proposed development is supported by Policy CDP 2 by virtue of the following:
- The site constitutes brownfield land, meaning that its development will reduce the pressure to develop elsewhere on Greenfield land, and
 - Prioritises the reuse of a vacant building.
- 3.15 Overall, the proposals are in line with the overarching principles of sustainable development and accord with Policy CDP 2.

SG2 - Sustainable Spatial Strategy

- 3.16 SG2 contains a suite of documents setting out spatial Supplementary Guidance for the areas identified in the form of Strategic Development Frameworks (SDFs) and Local Development Frameworks (LDFs). The subject site at Oakbank is covered by the North Glasgow Strategic Development Framework.
- 3.17 Whilst the subject site is not specifically identified by the SDF as a vacant and derelict site. It remains vacant and available to make a contribution to the objectives of the SDF. Indeed, North Glasgow is dominated by a poor quality environment and blighted by large areas of vacant and derelict land.
- 3.18 The Vision and Outcomes set out in the SDF specifically seek to provide the right environment for existing business to grow and to attract new businesses and supporting uses as well as supporting growth in emerging sectors and industries. Moreover, within Economic Development Areas proposals for Class 4, 5 and 6 uses will be supported.

CDP3 - Economic Development

- 3.19 Policy CDP 3 Economic Development applies which is underpinned by Interim Planning Guidance (IPG) 3. This policy and associated guidance seeks to support Glasgow's economy by directing development to appropriate locations and identifying where in the City economic development will be encouraged. The subject site is an allocated Economic Development Area which is specifically designated to support Class 4, 5 and 6 uses.

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CONCLUSIONS

- 4.1 Chemify proposes to use an existing industrial building for research and development purposes. The property benefits from either Class 5 or 6 consent (as described earlier) and as such, there is no material change of use to Class 4. The Applicant can occupy the building without the need for planning permission. Other internal works do not require planning consent and there are no alterations to access or other infrastructural arrangements.
- 4.2 The proposals for consideration within this application include the erection of a new flue stack with associated and ancillary works (mezzanine deck/AHU/air handling duct), occupation of dedicated yard space with a compound for the containerised storage of substances used in the processing of the chemicals (and waste/recycling area), the erection of a new section of security fencing with gated access and dedicated EV charging point.
- 4.3 The operation proposed is a low volume chemical production facility. The quantity of vapour produced is extremely small and diluted by many orders of magnitude as it passes through the air handling system before being expelled into the atmosphere via the flue stack. This is a standard method of containment used in all chemistry laboratories and uses well established technology.
- 4.4 The property lies within an existing industrial estate and in a wider locale which is not dominated by any particular land use. Indeed, there is significant commercial and industrial activity within the local area and potential sensitive receptors in the form of residential use is restricted to locations beyond Garscube Road to the south/south-west.
- 4.5 On the basis of the very low quantity of chemicals required to operate this facility and the bespoke contained technology as described, we do not consider there to be any risk to human health as a result of the resultant emissions. Indeed, a pre-application response by the Environmental Health consultee confirmed that there was no need for the application to be supported by an Air Quality Assessment.
- 4.6 Overall, we are of the view that the proposals would comply with the provisions of the development plan and consider that planning permission should be granted accordingly.

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