

PLANNING STATEMENT

**Proposed Mixed Use Development,
Production and Rehearsal Space,
Purpose Built Student
Accommodation, and Commercial
Uses at Site at 40 Edington Street,
Glasgow**

Client: Scottish Opera Ltd

February 2024

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1 INTRODUCTION

BACKGROUND

Ryden has been appointed by Scottish Opera Ltd (hereby also referred to as “the Applicant”) to provide planning advice with regards to a proposed mixed use development, including production and rehearsal space, purpose built student accommodation, and commercial uses at a site at 40 Edington Street, Glasgow (hereby referred to as the “application site” and “Site”).

The proposed description of development is as follows:

‘Mixed-use development to provide music rehearsal and performance spaces and film facilities, general industrial and office and production space (Class 11, Class 4, Class 5, and Class 6) and purpose built student accommodation (Sui Generis), retail and professional services (Class 1A), food and drink uses (Class 3 and sui generis), non-residential institutions uses (Class 10), assembly and leisure (Class 11), with building refurbishment and alteration works, demolition, associated landscaping, public realm, access and infrastructure’ (hereby also referred to as “the proposed development”).

If there is any need to review the above description of development as part of the validation process, we would be pleased to discuss as necessary. This is important to the Applicant from a delivery perspective.

RED LINE APPLICATION BOUNDARY

Any changes to the red-line boundary from that illustrated at Proposal of Application Notice (“PAN”) stage are de-minimus, and remains within the red line boundary at PAN stage.

In terms of other owners, Scottish Canals and Glasgow City Council (“GCC”) have been owner notified given the red line encroaches onto their land, although the development itself will not. The public realm steps and bridges to the garden land on Scottish Canals land

PRE APPLICATION DISCUSSIONS

Glasgow City Council Planning Department

A formal pre-application process has been undertaken with GCC, including direct discussions and workshops. This included sharing design statements that outlined the proposed development, the proposal characteristics, and an overarching planning policy review.

These discussions have been highly productive and helped to establish an approach to the design of the proposed development and planning strategy.

The Applicant and design team have paid full cognizance to the comments raised by GCC and meaningfully addressed them within this submission.

Matters raised and addressed through the process included principles of development; scale and mass and scenario testing of layouts and locations of height; environmental conditions; amenity allocation; reconfiguration of buildings and height to enhance outlook; elevational treatment and articulation; and demonstration of the flexibility / adaptability of the building to alternative uses, as per policy.

In addition, formal Pre-App discussions with Historic Environment Scotland (“HES”) and Scottish Canals have commenced regarding the mitigation of impact of the design on the Scheduled Monument (Glasgow Branch of the Forth and Clyde Canal), which will lead to an application for Scheduled Monument Consent at the appropriate point. These pre-application discussions with Historic Environment Scotland have confirmed that the Scheduled Monument Consent application relating to the development can follow the Planning Application and its determination.

The accompanying Design & Access Statement expands upon the proposals and how we have addressed GCC comments through the pre-application process.

PURPOSE OF PLANNING STATEMENT

Sections 25 and 37(2) of the Town and Country Planning (Scotland) Act 1997 requires that planning decisions be made in accordance with the Development Plan unless material considerations indicate otherwise.

Accordingly, the purpose of this Planning Statement is to provide an assessment of the proposed development against the relevant Development Plan policies, national planning policy and other material considerations. The case presented within the following Chapters provides a robust justification for the proposed development.

FORMAT OF PLANNING STATEMENT

This statement is presented as follows:

- Chapter 2 provides a background to the Applicant;
- Chapter 3 details the application site and proposed development;
- Chapter 4 highlights supporting studies submitted as part of the planning application;
- Chapter 5 assesses the proposed development against relevant planning policy;
- Chapter 6 assesses material considerations;
- Chapter 7 sets out overall conclusions.

2. THE APPLICANT

Scottish Opera is one of five National Performing Company's directly funded by the Scottish Government and the only full-time, professional opera company in Scotland. Scottish Opera attracts significant support from individuals, trusts, and the private sector to supplement earned income from ticket sales, production hire, transport, and manufacturing.

Founded by Sir Alexander Gibson in 1962, inaugural productions of *Madam Butterfly* and *Pelléas and Mélisande* were staged at the King's Theatre in Glasgow. In 1974 Scottish Opera purchased the Theatre Royal in Glasgow and established Scotland's first national opera house. In 2014 there was a major redevelopment of the foyer system of the Theatre Royal securing the future of Scottish Opera's 'showroom'.

Scottish Opera's repertoire places existing audience favourites next to surprising, less familiar works and new commissions. The Company presents full-length, fully-staged opera performances and concerts in Glasgow, Edinburgh, Aberdeen, and Inverness, in addition to touring to a minimum of 35 communities per annum across Scotland – from Lerwick and the Western Isles, to Stranraer and Kelso, and everywhere in between.

Scottish Opera contributes significantly to Scotland's cultural ecology, retaining artists, creatives, artisans, and other performance-related professionals in Scotland through employment and training opportunities. Scottish Opera is committed to supporting the development of young artists, creatives, and artisans.

Scottish Opera became the first European opera company to establish an Education Department in 1971, from which it has grown into an extensive, integrated Outreach & Education programme. This engages with people of all ages, social backgrounds and abilities, contributing to the development of individuals' personal creativity, interest in opera and health & wellbeing.

Scottish Opera wish to consolidate their base in Glasgow with the proposed development, which is to be known as 'New Rotterdam Wharf', thus securing their commitment to the city and the wider social and economic benefits their presence brings.

There are several key initiatives that Scottish Opera are currently exploring designed to maximise the opportunities to engage with children and young people within the context of the built environment of the proposed structure and the adjacent outdoor spaces planned for the site.

A positive example of community benefits and collaboration is Glasgow Chamber of Commerce's *Step Up to Net Zero* (SUtNZ) programme that drives the moral and ethical motivation, as well as the financial impetus, for the promotion of the cyclical nature of recycling across a vast range of businesses and educational establishments and works with schools across the city on a strand of the main initiative called *Climate Heroes*. Scottish Opera's close neighbour is Abercorn Secondary School for pupils with additional support needs which, accepting the Climate Heroes challenge, recently took possession of a portacabin that with support from local businesses, that will be transformed by the young people into a space to explore the impact of climate change as

well as the defining need to source and utilise building materials, furnishings, interior and exterior landscaping design models that meet the net zero challenge. From March 2024, the Chamber will offer fully funded six- month placements for recent graduates to ‘embed’ with businesses to help Glasgow SMEs in their efforts to reach net zero by taking action towards net zero and circular goals. Abercorn will be working with one of these Climate Hero graduates and already, we can identify some key areas for collaboration with the graduate acting as the conduit to promote best practice between Scottish Opera and the school.

Scottish Opera already partners with Abercorn to support limited work experience opportunities, (focus to date has been on social interaction/ confident building activities). However, this new initiative will open up a long- term sustainable programme of activities that we can engage with these young people in; encompassing the recycling goals we already pursue (in terms of sustainable materials for sets and staging) as well as new objectives around the structure of our outdoor areas (multi-purpose creative and aesthetic activities within an oasis space situated in a busy urban environment).

The Chamber’s Developing Young Workforce programme also presents Scottish Opera with significant opportunities to utilise the facilities the new building will have, to contribute to the training and skills development of young people living in and around Greater Glasgow area. The DYW programme has been expanded from Construction & Built Environment, Housing and Health & Social Care sectors to include two new programmes: Marine and Maritime and Creative Arts & Performance Industries. Scottish Opera have already signalled our interest in being included in the *Work Aware Scheme* – originally a programme for Primary 7 to Secondary 2 pupils – now being extended for up to three years for pupils in years S 3 – 5. In the areas of technical theatre and production skills sets, the spaces planned for the new building will enable us to create a hybrid classroom and work place environment: with young people moving seamlessly between attending modular practical workshops (21st century take on the old ‘work experience model for 14 - 15 year olds) in contrasting specialist areas (‘taster’ sessions) as well as attending presentation and interactive discursive seminars which enables the young people to get to grips with the intersectionality of the modern performing arts organisation.

The above gives context to who Scottish Opera is and the exemplar work they do.

Background to the Proposals

Scottish Opera wish to advance their ambition to remain in, and reaffirm their commitment to, Glasgow. This proposed development would help to secure Scottish Opera’s presence within Glasgow for the next 60+ years by rationalising and consolidating three of their current scattered five premises under one roof to demonstrate measurable economic, business, and artistic advantage.

Their current premises include their rented HQ in the ageing Victorian building at 39 Elmbank Crescent, Charing Cross, Glasgow, and a large orchestra rehearsal space out at Hillington Park, Renfrewshire on a short-term lease.

It is these operations they wish to consolidate at Scottish Opera's existing production facility at 40 Edington Street.

Opened in 1999, their purpose built Edington Street Production Studios is the only integrated manufacturing and rehearsal facility in Scotland. It is the workspace for many highly skilled artisans.

Bespoke sets, props, costumes and wigs are manufactured for each production alongside teams of specialist stage managers, lighting and stage technology technicians. The studios host orchestral players and singers from around the world for rehearsals. They are also the hub for a huge national education and outreach programme.

It is onto this amazing legacy that Scottish Opera wish to build.

Applicant Ambition

In 2018 the Board of Scottish Opera completed a review of the company's existing built estate. It was agreed to consider proposals for the development of a consolidated headquarters for Scottish Opera bringing together administrative, production and rehearsal facilities onto a single site.

A comprehensive options appraisal identified the application site for the new facility, lying immediately adjacent to Scottish Opera's existing Production Studios on Edington Street and between the Production Studios and the Maryhill spur of the Forth and Clyde Canal.

Applicant Brief

The proposals include new dedicated rehearsal space for the Orchestra of Scottish Opera along with musical and vocal practice rooms, break out spaces, costume and music storage and flexible office spaces. This consolidation will allow the Scottish Opera team to collaborate more closely and easily leading to significant artistic developments, organisational efficiencies and environmental benefits.

Scottish Opera have also identified an opportunity to bring any available time (c 75%) in the orchestra rehearsal room to market – especially the Film and TV sector as a sound stage, or a small concert hall, or a 'black box' theatre space – due to the planned size and capacity of this room. Further, the Scottish Film and TV sector has identified significant skills shortages as the key limitation to further growth of this sector so many of the additional spaces will be available to the Further Education sector for specialised short form courses.

This ambitious plan sees the Applicant utilising approximately half the available space on the New Rotterdam Wharf site, with the remainder, circa 40%, of the site reserved for a Purpose Built Student Accommodation ("PBSA") proposal. The net income contribution from a PBSA development forms an integral and imaginative component of the overall funding portfolio for the Scottish Opera extension. Given the acknowledged shortage of student accommodation in Glasgow which threatens Glasgow's position as a centre of academic excellence, Scottish Opera sees a once in a generation opportunity to achieve its vision and remain a continued presence in Glasgow.

The Applicant's ambitions with this development are focussed on playing their part in protecting the future of the arts and audiences in Scotland. Much of the funding for the development would come from the sale of the PBSA with an amount of private and public sector fundraising likely to be undertaken in the future.

In terms of the student accommodation, Scottish Opera is in negotiations with a major PBSA operator and these are at an advanced stage. It is for commercial confidentiality reasons they are not named at this moment in time.

This is truly an exceptional development, as an arts and community opportunity for Scottish Opera and the City of Glasgow.

3. PROPOSED DEVELOPMENT

SITE LOCATION AND DESCRIPTION

The application site is at Edington Street, Glasgow, and is located immediately to the north of the city centre. The application site comprises two separate but connected areas of land, both owned freehold by Scottish Opera.

The first area (fronting Edington Street and running the length of the site) is occupied by Scottish Opera's existing Production Studio's and related service yards which are accessed off Corn Street to the south and Sawmillfield Street to the north.

The second area, immediately to the east of the Production Studio's, is a brownfield site – known as 'the platform site'. This site is entered from Sawmillfield Street to the north.

To the east is the canal bank and tow path that is the Glasgow Branch of the Forth and Clyde Canal owned by Scottish Canals. The Canal and its environs is a Scheduled Monument Ref. SM6771. Further east on the opposite canal bank is Speirs Wharf development converted in the 1970's/80's from canal side warehousing to residential use.

To the south is Corn Street and an adjacent privately owned small scale factory unit. A former access to the platform development site from Corn Street is bricked up.

The application site sits at the heart of a locality that has over a period of time developed into a Cultural Quarter with Scottish Opera leading the way forward, encouraging like-minded organisations to join them in this area of Glasgow. The National Theatre of Scotland, Royal Conservatoire of Scotland, The Glue Factory and The Whisky Bond are all close neighbours to Scottish Opera's existing Production Studios facility.

The site subject of development does not contain any listed buildings and is located outwith the Central Conservation Area. There are listed buildings in the vicinity including the Category B listed Speirs Wharf complex of warehouses and the Category B listed Canal House to the east of the canal.

A detailed site appraisal and historical analysis is included within the Design & Access Statement.

PLANNING HISTORY AT SITE AND NEIGHBOURING SITES

An overview of the planning history in the local area, as well as application site, is noted below. Please refer to the Design & Access Statement for more details, including locations of the history noted.

2006 Design Proposals

In 2006, design proposals were submitted by RMJM Architects and Bradford Robertson Architects for a number of sites along the canal between Port Dundas and Speirs Wharf. This included the Scottish Opera site.

2008 Masterplan

In 2008, the Glasgow Canal Regeneration Partnership developed a Regeneration Framework for Speirs Locks. The project cited the disconnect from the City Centre as a barrier to redevelopment in the area, and made addressing this a key objective.

The architect's proposals to overcome this included reclaiming the link under the M8 motorway for pedestrians and cyclists, by blanketing it in a vivid red surface and creating a new gateway to North Glasgow and the canal. Proposals would enliven the canal bank with temporary studios, cafés and performance spaces.

A key characteristic of the 2008 masterplan was to capitalise on the growing cultural quarter in the area, with Scottish Opera at its heart. Proposals described an ambition to "somehow turn the [Scottish Opera] building inside out so this creativity could energise the surrounding area".

The masterplan was adopted by GCC, and a report on the Masterplan and community engagement process was produced by the Glasgow Canal Regeneration Framework in 2008.

Other key characteristics of the masterplan included:

- Mixed use buildings to Garscube Road with local amenity at street level.
- Views and links between gaps in the buildings.
- An urban link from the canal to the underpass.
- Existing street patterns adjusted to emphasise routes to the canal.
- Prominent canal-side commercial space

2014 Student Campus

In 2013-14 Stellan Brand Architects submitted two-phase proposals to deliver over five-hundred student flats on a site immediately to the north of the Scottish Opera application site. Proposals were developed in accordance with the masterplan developed by 7N Architects.

Phase One proposals featured a linear block along the canal side, stepping up to a thirteen storey block. Phase Two proposed two further blocks, seven and twelve storeys respectively, with an arrival plaza and outdoor amenity for adjacent arts venues the Glue Factory and Whisky Bond.

Phase One of the proposals received planning consent, and Phase Two received a 'minded to grant' decision, but the project did not progress to site.

2020 Student Campus Refresh

In March 2020 Stellan Brand Architects submitted reworked proposals on the same site as 2014 for planning permission.

The scheme was for two-hundred and three student flats, split between towers of thirteen and twenty storeys at the north and south extents of the site, lying immediately to the north of Scottish Opera's land. Between the towers was an open plaza with ramped access to the canalside, and opportunities for retail and commercial use.

More details on the history of the application site and surrounds is noted within the Design and Access Statement.

PROPOSED DEVELOPMENT

The proposed development is for a new Scottish Opera headquarters, purpose built student development with 700 units (hereby also known as "PBSA"), and significant commercial and open spaces.

The opportunity presented at the application site, which is branded 'New Rotterdam Wharf' is to transform a single sided 'industrial estate' plot into a mixed use vibrant urban block, activated on all sides with new cultural, student use and commercial opportunity, all crucially connecting with the western tow-path of the Forth and Clyde Canal, bringing life and vitality to this amazing city asset.

The development strategy that has evolved (in discussion with GCC) is to place the proposed new Scottish Opera rehearsal and support building between the existing Edington Street Production Studios and the canal towpath. A core circulation route through this new building will link a new canal-side entrance down into the existing production studio and to the existing entrance on Edington Street.

The proposed Scottish Opera headquarters building will accommodate the following:

- A large orchestra rehearsal studio (20m wide x 35m length x 10m height to provide 7000m³ volume)
- Education studio (12m x 10.5m)
- Rehearsal studio / flexible space (13.5m x 9m)
- Practice rooms, which can double up as dressing rooms
- Music library
- Instrument store
- Costume store
- Laundry
- Offices and meeting rooms
- Café / social space plus circulation and ancillary accommodation such as WC's and stores
- Potential conference facilities

It is envisaged that the large orchestra rehearsal studio will accommodate performances with an audience of circa 200, plus provide lettable space for other cultural and creative sector organisations outside the Scottish Opera rehearsal period (approx. 10 weeks / annum).

In addition, the proposals provide high quality public realm to enhance the new building and wider development. This includes courtyard spaces at the platform site level and rooftop garden that enables Scottish Opera to host a range of activities including small scale music performances in the warmer months.

The building plan layouts have been developed in close partnership with the Scottish Opera staff and other potential stakeholders, including organisations such as STV Griffin Films, Visible Fictions Theatre Company and the Royal Conservatoire of Scotland who may hire the key rehearsal space for sound stage, rehearsal or performance use outwith Scottish Opera rehearsal periods.

The existing Scottish Opera building is essentially a double portal frame 'industrial shed' with metal cladding. There are service yards used for both service access and parking at both the northern and southern end of the building, which are accessed from Sawmillfield Street and Corn Street. The building will be overclad to improve its appearance. This includes feature cladding to the Edington Street entrance and canopy to match the cladding to the new pavilions at tow path level. The over cladding also provides the opportunity to improve the environmental performance of the existing building, including the addition of solar PV's on the roof to meet GCC's sustainability targets.

To the north and south, two PBSA blocks are proposed, with stepping scales, effectively 'book ending' the site and providing activated frontages to all four corners of the plot. Pended access under each PBSA block provides access to two internal courtyards providing service and visitor access to the Scottish Opera building.

Both PBSA blocks are made up of two intersecting volumes of differing scales.

The north block rises 20 storeys above Edington Street at its western side, whilst at the eastern side the lower volume is 13 storeys high - albeit with the 3 storey difference in height between Edington Street and the canal towpath, this north eastern volume only rises 10 storeys above the level of the canal towpath.

The south block rises 15 storeys above Edington Street at its western side, whilst at the eastern side the lower volume is 10 storeys high - albeit with the 3 storey difference in height between Edington Street and the canal towpath, this south eastern volume only rises 7 storeys above the level of the canal towpath.

New broad feature steps at both the north and south ends of the site provide connection between the ends of Sawmillfield St and Corn Street, connecting up to the canal edge.

The Speirs Wharf buildings have been a key consideration in the design of the proposed development, and these long distance views have influenced the massing design. The key move has been to maintain as much transparency and visibility through the site as possible, by articulating and shaping the development blocks to compliment these views.

The PBSA blocks on the North and South of the site have been articulated to create wedge shaped blocks, to help minimise the profile when viewed along the East-West axis.

The aim here is to retain visibility of the existing Speirs Wharf buildings from the West of the city, whilst maintaining good views from Speirs Wharf back across to the West of Glasgow.

Each PBSA block's footprint has also been staggered with an offset in the plan, to help break down the overall mass of the blocks. These staggered sections rise to different levels, where the side closest to the canal has been kept at a lower level, and the side facing the west of Glasgow rises taller.

The scale of the new Scottish Opera development has been kept to a minimum, with the bulk of the mass being tucked below the level of the canal towpath.

Two new pavilion buildings are proposed to rise two storeys above towpath level, reaching the approximate height of the existing treeline along the canal.

Landscape proposals have been considered as an overarching strategy for the entire site, including areas for Scottish Opera and for PBSA, and genuinely accessible community open space.

Please refer to the Design & Access Statement for more details on design and landscape matters.

SUMMARY OF STUDENT MARKET DEMAND

Savills has been appointed by the Applicant to provide a Purpose Built Student Accommodation Needs Assessment Report.

Glasgow has the third highest number of students of any city in the UK, but fewer PBSA beds. The application site is located to the immediate north of the city centre. All of Glasgow's main university campuses are accessible within 15 minutes cycling or 30 minutes using public transport. This includes the city-centre universities which cater to around 41,200 students and the main University of Glasgow campus to the north-west. It is also less than 20 minutes by bus or subway to Glasgow Central station.

The University of Glasgow also has a campus at Garscube, 5 miles north-west of its main campus. This is also accessible from the site within 40 minutes by public transport or 25 minutes cycling.

The report concludes that the scheme will help meet housing needs from the 77,640 full-time students living in Glasgow. The student to bed ratio is high at 3.8. This falls to 2.6 if students that live with parents or family are excluded -there is likely to be demand from some of these students, especially those commuting 30 miles or more. There is a clear undersupply of student accommodation in Glasgow and strong demand for additional bedspaces. The University of Glasgow has identified a large annual requirement over the next 4 years, which they are fulfilling with nominations agreements.

The site is aligned with the Locational Criteria of SG10, being located with good access to university and college facilities by active travel routes or public transport, as outlined in this report. There are currently 3.8 students per available bed in Glasgow, which falls to 2.6 when excluding the rising number of students living at home and commuting into Glasgow from surrounding areas.

Full-time student numbers across Glasgow based on historic trends are projected to rise by 4.4% per annum (1,800 students per year) whilst the development of the pipeline of student accommodation over the same period would struggle to meet this increase in demand (based on the 4,982 potential pipeline). The student housing supply/demand imbalance is expected to decrease marginally to 2.3 if the entire pipeline were delivered.

Students in Glasgow have historically been centred around their places of learning. One centre is in the West End of the city and the other is the city centre.

Based on the data zone populations, the application site is in an area of relatively low student density, with students currently making up 17% of the population.

The application site offers an opportunity to provide professionally managed student housing at the right location, which will benefit from on-going regeneration in the local area. There is an identified demand for additional PBSA in Glasgow and for the type proposed.

The student needs assessment report should be read in full alongside this Planning Statement.

4. SUPPORTING STUDIES

Through the pre-application process, relevant studies have been identified to support the mixed use planning application. These are as follows:

- Location Plan
- Full set of existing and proposed elevations, site plans, sections etc.
- Design & Access Statement
- Planning Statement
- Pre-Application Consultation Report
- Drainage Strategy Report
- Phase 1 Geo-Environmental Desk Study Report
- Interim Phase 2 Report on Ground Investigations
- Daylight and Sunlight Report
- Phase 2 Habitat Survey and Preliminary Ecological Appraisal & Draft Biodiversity Statement
- Energy and Sustainability Statement
- Archaeological Assessment
- Landscape and Visual Impact Assessment
- Flood Risk Assessment
- Noise Impact Assessment
- Operational Management Plan
- Purpose Built Student Accommodation Needs Assessment
- Socio Economic Impact Assessment
- Transport Statement
- Arboricultural Survey
- Tree Schedules
- Wind Microclimate Analysis
- Air Quality Assessment

We trust the above comprehensive list of supporting studies provides a robust assessment of all environmental and design matters.

However, should GCC Officers require from the Applicant further particulars, documents, materials or evidence which they consider that they require to enable them to address any outstanding matters, we would be pleased to supplement the above as necessary during the planning determination phase.

5. DEVELOPMENT PLAN

INTRODUCTION

Section 25 of the Town and Country Planning (Scotland) Act 1997 (as amended) indicates that in making any determination under the Planning Acts, regard is to be had to the Development Plan. The determination shall be made in accordance with the Plan unless material considerations indicate otherwise.

The Development Plan in respect of the application site is the following:

- National Planning Framework 4
- Glasgow City Development Plan 2017

NATIONAL PLANNING FRAMEWORK 4

Following the approval by the Scottish Parliament of National Planning Framework 4 (“NPF4”) on 13 February 2023, NPF4 forms part of the statutory development plan, along with Glasgow City Development Plan (March 2017) (“CDP”) and its supplementary guidance.

NPF4 supersedes National Planning Framework 3 and Scottish Planning Policy. In cases where there is policy conflict between the policies within the adopted Local Development Plan and NPF4, NPF4 will take precedence in the planning decision-making process.

NPF4 is underpinned by six overarching spatial principles:

- **Just transition.** *We will empower people to shape their places and ensure the transition to net zero is fair and inclusive.*
- **Conserving and recycling assets.** *We will make productive use of existing buildings, places, infrastructure and services, locking in carbon, minimising waste, and building a circular economy.*
- **Local living.** *We will support local liveability and improve community health and wellbeing by ensuring people can easily access services, greenspace, learning, work and leisure locally.*
- **Compact urban growth.** *We will limit urban expansion so we can optimise the use of land to provide services and resources, including carbon storage, flood risk management, blue and green infrastructure and biodiversity.*
- **Rebalanced development.** *We will target development to create opportunities for communities and investment in areas of past decline, and manage development sustainably in areas of high demand.*
- **Rural revitalisation.** *We will encourage sustainable development in rural areas, recognising the need to grow and support urban and rural communities together.*

The proposed development can draw significant support from each of these principles, and that where necessary, the appropriate balance has been struck between promoting health and heritage conservation, and promoting development and investment.

National Planning Framework 4 – Specific Policies

Under NPF4, policies considered relevant to the assessment of the proposed development are:

- Policy 1 ‘Sustainable Places’
- Policy 2 ‘Climate Mitigation and Adaptation’
- Policy 3 ‘Biodiversity’
- Policy 4 ‘Natural Places’
- Policy 7 ‘Historic Assets and Places’
- Policy 9 ‘Brownfield, vacant and derelict land and empty buildings’
- Policy 12 ‘Zero Waste’
- Policy 13 ‘Sustainable Transport’
- Policy 14 ‘Design, Quality and Place’
- Policy 15 ‘Local Living and 20 Minute Neighbourhoods’
- Policy 16 ‘Quality Homes’
- Policy 19 ‘Heating and Cooling’
- Policy 18 ‘Infrastructure First’
- Policy 20 ‘Blue and green infrastructure’
- Policy 21 ‘Play, Recreation and Sport’
- Policy 22 ‘Flood Risk and Water Management’
- Policy 23 ‘Health and Safety’
- Policy 25 ‘Community Wealth Building’

An assessment of the proposed development against relevant NPF4 policies is set out below.

Policy 1 ‘Sustainable Places’ & Policy 2 ‘Climate Mitigation and Adaptation’ seeks to ensure that all developments tackle the climate and nature crisis. This will include promoting development that minimises emissions and adapts to the current and future impacts of climate change. This will include siting and design to minimise lifecycle greenhouse gas emissions as far as possible, and to adapt to current and future risks from climate change.

The Chief Planner letter published on 8th February 2023 regards 'transitional arrangements for National Planning Framework 4 - February 2023' set out some more specific advice on these two policies and stated:

“There is currently no single accepted methodology for calculating and / or minimising emissions. The emphasis is on reducing emissions as far as possible, rather than eliminating all emissions.

At this stage, quantitative assessments are not expected for all applications and there are no defined thresholds that require different levels of information at this stage. Planning authorities will be aware that this is unlikely to be a key consideration for many applications, for example for smaller scale developments, householder applications or many changes of use. However, for other types of development proposals that may generate significant emissions, such as some national or major developments, we consider it to be reasonable to expect quantitative information to be provided. For developments that require an Environmental Impact Assessment (EIA), the impact of the project on climate (e.g. the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change will have been considered as appropriate in the EIA Report. See Circular 1/2017 for further information.

Last year the Scottish Government published carbon management guidance for projects and programmes. Whilst this is aimed at larger scale projects within city region and growth deals and a fully quantified approach is only likely to be proportionately applicable to larger scale proposals, at least whilst practice and methodologies develop over the coming years, the guidance includes useful information and highlights established methodologies which may be of assistance to applicants and planning authorities. Published research on the Lifecycle Greenhouse Gas Emissions of NPF4 Proposed National Developments, also offers an example of a high-level approach to identifying direct and indirect effects of proposals on GHG emissions which can be embedded into statutory Environmental Assessment obligations.”

Regards the proposed development and Policies 1 and 2, sustainability and addressing the climate crisis has been a key pillar of the design approach.

The application site is brownfield and previously developed, and the footprint of the proposed buildings is focussed on the gap sites. The proposal is to develop energy efficient Scottish Opera headquarters, PBSA, significant open space, and of an appropriate scale.

There is to be significant landscaped and amenity areas, and as noted under Policy 3 below, this will provide biodiversity enhancements and contribute towards the nature and climate crisis.

To assist this process, Max Fordham have been commissioned to provide an informed narrative around energy as it relates to the proposed development.

The low energy and carbon design measures outlined in the Energy and Sustainability report provides design options that will ensure compliance with NPF4 and GCC's CDP5 Resource Management policy. Achieving the required minimum 20% reduction in carbon emissions compared against the 2022 notional building and a 20% carbon abatement through the use of low and zero carbon generating technologies to serve the development.

The proposed development responds to local, regional, and national planning policies relating to sustainability. The proposed development's Sustainability initiatives cover the following:

Energy Efficiency: The energy strategy measures will be included to make the development as sustainable as possible, such as: all of the heating will be supplied by air source heat pumps, overheating and daylight assessments have been carried out to allow the building to be designed to reduce the need for cooling and lighting, and a fabric-first approach will be utilised to reduce heating and domestic hot water energy demand.

Low and Zero Carbon Technology: The feasibility for a variety of on-site LZCGT has been analysed. Use of ASHPs for the heating and cooling strategy, as well as rooftop PVs has been decided upon as the most effective use of LZCGT for this development. This will help to reduce the operational carbon of the development.

Resource Management: The material selection will be made with an aim to reduce Whole Life Carbon as far as possible, and lean design choices have been made in the structural design for all buildings on site. Circular Economy principles have been implemented in the design such as designing for adaptability and flexibility, efficient construction techniques, designing for ease of disassembly and material re-use. A site waste management plan will be put into place by the contractor, and sufficient space will be provided to allow for efficient waste management in operation.

Health and Wellbeing: Air quality, overheating risk and security of occupants have been carefully considered in the design of both the Scottish Opera building and the PBSA. A Noise Impact Assessment has been completed, looking into the impact of noise on the community and the building occupants. Recommendations are to be implemented in the design.

Sustainable Travel: Car parking has been minimised, and all spaces are to be passive to allow for potential future installation of EV charging. Bike parking has been provided across the development, with end-of-journey facilities provided for staff in the Scottish Opera building. A Transport Assessment has been completed, looking at the impact of the new development on the area. The development is situated in a location easily accessed by foot, bike, and various modes of public transport.

Green Infrastructure: An ecology report has been prepared, looking at the ecological value on the existing site and surrounding area. The planting strategy for the development will aim to increase biodiversity and the amount of Urban Greening. A variety of external amenity spaces will be provided, both open to the public and for private use. These spaces will facilitate planting, seating, event and socialisation spaces and connection to the canal towpath.

Water Efficiency and Flood Risk: The flood risk assessment completed confirmed the site as low risk from all types of flooding. Water efficiency measures will be implemented. The proposed surface water drainage strategy seeks to utilise a combination of Sustainable Drainage Systems such as permeable paving, green and blue roof systems, and rain gardens to provide attenuation and water quality improvements.

The proposed development will minimise emissions and promote a more resilient place to climate change impacts, in compliance with Policy 1 and Policy 2 of NPF4.

Policy 3 'Biodiversity' seeks to protect biodiversity, reverse biodiversity loss, deliver positive effects from development and strengthen nature networks.

The policy states that:

- Development proposals will contribute to the enhancement of biodiversity, including where relevant, restoring degraded habitats and building and strengthening nature networks and the connections between them. Proposals should also integrate nature-based solutions, where possible.
- Development proposals for national or major development, or for development that requires an Environmental Impact Assessment will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention. This will include future management.
- Proposals should be based on an understanding of the existing characteristics of the site and its local, regional and national ecological context prior to development, including the presence of any irreplaceable habitats.
- Wherever feasible, nature-based solutions have been integrated and made best use of.
- An assessment of potential negative effects which should be fully mitigated in line with the mitigation hierarchy prior to identifying enhancements.
- Significant biodiversity enhancements are provided, in addition to any proposed mitigation. This should include nature networks, linking to and strengthening habitat connectivity within and beyond the development, secured within a reasonable timescale and with reasonable certainty. Management arrangements for their long term retention and monitoring should be included, wherever appropriate.
- Local community benefits of the biodiversity and/or nature networks have been considered.
- Any potential adverse impacts, including cumulative impacts, of development proposals on biodiversity, nature networks and the natural environment will be minimised through careful planning and design. This will take into account the need to reverse biodiversity loss, safeguard the ecosystem services that the natural environment provides, and build resilience by enhancing nature networks and maximising the potential for restoration

Policy 4 'Natural Environment' seeks to protect, restore and enhance natural assets making best use of nature-based solutions.

It states amongst other matters, that development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported, and that development proposals that are likely to have an adverse effect on species protected by legislation will only be supported where the proposal meets the relevant statutory tests.

If there is reasonable evidence to suggest that a protected species is present on a site or may be affected by a proposed development, steps must be taken to establish its presence, level of protection required by legislation must be factored into the planning and design of development, and potential impacts must be fully considered prior to the determination of any application.

In terms Policies 3 and 4 above, ESS Ecology and Harrison Stevens has undertaken a Preliminary Ecological Appraisal (“PEA”) and Biodiversity Statement.

The aim of a PEA survey is to identify all broad habitat types within the site boundary and included a search for suitable habitat for protected species and provides recommendations for further survey, where appropriate.

The open spaces of the application site are mostly Phase 1 habitat type J5 hard standing. Within the development site there are several stands of mostly young shrubs and broadleaved trees, with a few semi-mature trees. These habitats approximate most closely to Phase 1 habitat type A1.1.2 broad-leaved plantation woodland. None of these habitats or the plant species present are protected or rare.

The survey of Phase 1 habitats focussed upon the land within the development site boundary. Where access was feasible, the extended Phase 1 habitat survey area was increased around the site boundary to determine whether there are suitable habitats for protected species within a 10m buffer zone for water voles, a 15m buffer for bats, and within 50m for badgers and otters.

The PEA concludes that there is no evidence for nearby protected sites which could be adversely impacted or potentially constrain this development, nor of any protected species being within the application site.

With the exception of mitigation or survey for birds which could be disturbed during breeding attempts within trees and shrubs to be removed, removal of invasive non-native Buddleia shrubs, a pre-construction otter survey and a precautionary otter protection plan, no further mitigation is necessary. These requirements can be secured through appropriately worded planning conditions.

The PEA does identify ecological enhancement recommendations for a range of landscape and habitat creation measures, as suggested by NatureScot (2023) and to comply with NPF4 policy.

Potential ecological enhancement measures to provide biodiversity net gain in relation to protected species, and habitats are detailed in Section 7.6 of the PEA. This includes trees and shrubs with abundant flowers, nectar, seeds, nuts and fruits, including native species; to benefit wildlife and biodiversity and to help create a pleasant and attractive environment for the occupiers, visitors and residents of the mixed use, cultural and residential site, the landscape proposals should include a native wildflower area as suggested by NatureScot; a green wall protecting the canal, which is a protected monument, will be included as part of the landscape proposals for the development; the inclusion of bat roosting blocks.

Further habitat enhancement for insects will be achieved through the habitat creation and native species plantings within the landscape proposals, will increase the supply of insect food for bats.

The PEA recommendations for the site have been applied to the proposed development.

In terms of landscape proposals, developing this site gives opportunity to provide an improved outlook and visual amenity, establish a biodiversity net gain on the site, and create a large public open space which is functional, adaptable and inclusive. The landscape proposals seek to maximise the area of open space within the development while providing a safe and attractive amenity for the residents. The site consists of a number of amenity spaces with private and public outlooks, creating opportunities for

locals and visitors to the area. The walled garden is a hidden gem nested on top of the new Scottish Opera Rehearsal Building, which offers an inclusive and green setting with views across Glasgow's skyline.

The definition of public and private space is important in providing privacy to the new residences while offering accessible space to all. The landscape design is carefully considered to create a planted buffer zone to any parts of the buildings where privacy is required. Parking is mainly accommodated within functional areas of the site to maximise external areas outside PBSA and Scottish Opera amenity spaces. As noted, the boundary wall to the towpath will be partially screened with a freestanding green wall system to soften the visual effect of the tall structure whilst respecting its historic significance.

During the development stages of the project, the following 10 landscape and public realm design principles have been set out:

1. To improve access and connections between Speir's Wharf and Oakbank areas.
2. To create a visual link between Forth & Clyde Canal Glasgow Spur Towpath and Glasgow cityscape.
3. To design external spaces that would be inclusive and accessible to different members of the local community.
4. To encourage sustainable transport choices through integration of bike ramps and variety of standard and non-standard bike stands across different levels.
5. To prioritise pedestrian and cyclist movement over cars and servicing through creation of shared and levelled surfaces.
6. To design a space that is flexible for hosting events and performances with provision of power and common fixing points for pavilions.
7. To enhance biodiversity net gain of the area with introduction of a variation of native tree and plant species across the development.
8. Create climate resilient environment through introduction of wider mix of species and resilient trees.
9. To design a scheme that Integrates surface water management through introduction of rain gardens and porous surfaces.
10. To choose a low carbon approach through the use of locally source sustainable materials and natural materials that have a lower carbon manufacturing process.

In terms of specific areas, the landscape proposal has been considered as an overarching strategy for the entire site, including areas for Scottish Opera and for PBSA. Due to topographic characteristics of the site and coordination with existing and proposed buildings, the following areas have been identified to form part of the landscape proposal:

- Corner Plazas at Edington Street (Level 0)

- Internal Courtyards set between new Scottish Opera Rehearsal Building and new PBSA blocks (Level 1)
- Stepped landscape areas, connecting top of Corn St and top of Sawmillfield Street to the towpath level
- PBSA plazas connecting to towpath (Level 3)
- Walled Garden and adjacent areas (Levels 3 & 4)
- PBSA Roof Terraces (Levels 10 & 13)

These areas are described in more detail within the Design & Access Statement.

The above approach, sitting alongside tangible biodiversity and landscape enhancement, evidences that the proposed development complies with NPF4 Policy 3 and Policy 4.

Policy 7 ‘Historic Assets and Places’ seeks to protect and enhance historic environment assets and places, and to enable positive change as a catalyst for the regeneration of places.

Development proposals with a potentially significant impact on historic assets or places should be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place. The assessment should identify the likely visual or physical impact of any proposals for change, including cumulative effects and provide a sound basis for managing the impacts of change.

From review of the online Council maps, the application site is outwith the Central Conservation Area and there are no listed buildings within it. However, it bounds the Forth and Clyde Canal to the east, which is a Scheduled Monument and there are listed buildings in the vicinity, including the Category B listed Speirs Wharf complex and the Category B listed Canal House to the east of the Canal.

In this regard, the Design and Access Statement includes a Heritage Impact Assessment.

In summary, in terms of impact on the Forth and Clyde Canal Scheduled Monument, the proposed works will have a positive impact on the monument’s cultural significance in that the proposal’s will encourage greater footfall and use of the towpath and active travel networks that run along the canal.

Four new connections are proposed to the western towpath of the canal and are designed to span across the retaining wall structure that forms the western boundary of the scheduled monument and eastern boundary of the development site.

These connections include stepped access from Corn Street to the south and Sawmillfield Street to the north of the development site, and the two connecting bridges that lead from the tow path onto the top of the Scottish Opera building, providing access into the publicly accessible roof top garden and into the Scottish Opera building from the tow path level.

The structure for these new elements is being designed to ‘bridge’ over the top of the retaining wall that forms the eastern boundary of the site and land lightly onto the grassed strip between the tree belt and the tow path.

Scheduled Monument Consent has already been granted for site investigations to determine how best to address and land these elements to minimise disruption (Reference Case ID: 300068921). There will be minimal aesthetic impact on the Scheduled Monument, with minimal intervention where the steps and bridges land on the grassed bank and new pathways link to the existing tow path. Lighting will be enhanced along the length of the development site, with cognisance to not disturb wildlife habitats.

Ultimately, the canal and its banks will be readable and useable by the public with no detrimental impacts. Formal discussions with HES and Scottish Canals are taking place to ensure this is the outcome, including any formal procedural consenting routes.

In terms of impacts upon the listings of Speirs Wharf and the Canal House, whilst the proposed development will have no detrimental impact on the listed buildings, it is acknowledged that there will be an impact upon views of these buildings in the townscape.

A key driver for the location, orientation and massing of the blocks on the proposed development site has been the preservation of Speirs Wharf. By centrally locating the lower Scottish Opera building this preserves views to and from the upper levels of Speirs Wharf. The pavilion elements that sit above the plinth extend to a similar height to the trees adjacent to the towpath to minimise their visual impact.

The PBSA blocks 'bookend' the application site and are orientated east – west to minimise the visual impact on the setting of Speirs Wharf behind. These blocks frame the views of Speirs Wharf from the west.

It is recognised that the application site was previously developed, and the historic Speirs Wharf warehouse buildings looked over buildings and were not afforded the visual prominence they enjoy at present. The site was occupied by foundry and sawmill buildings before the building in 1898 of the Port Dundas Electricity Generating Station (refer to photos within the Design & Access Statement). That building had a terracotta brick façade, with a central tower and three larger cooling chimneys to the canal side. The chimneys were demolished approximately ten years in advance of the whole building being removed in the early 1970's. The dominant horizontal roof line, three chimneys and a central tower and would have impacted on the views of Speirs Wharf. This impact would have been less consequential prior to the residential conversion of the warehouses.

The Applicant has appointed Harrison Stevens to undertake a Townscape and Visual Impact Assessment ("TVIA") to assess the visual effects of change arising from the introduction of new building of scale in this location.

The TVIA concentrates on the key townscape and visual issues identified during the pre-planning stages and in conjunction with GCC in relation to:

- Townscape character and resources, including effects on the aesthetic values of the townscape, caused by changes in the elements, characteristics, character and qualities of the townscape as a result of development; and
- Visual amenity, including effects upon potential viewers and viewing groups caused by change in the appearance of the townscape as a result of development.

The TVIA has followed recognised guidance and assessed the potential effects of the proposed development on townscape and visual receptors using a core study area of c.0.5km beyond the site boundary to assess townscape effects in detail.

This assessment has established that the proposed development will change the existing townscape and visual baseline conditions.

Although there will be effects on both the townscape resource and to visual amenity, some of which will be significant, these effects will be generally localised and should be considered in the context of the re-configuration and long-term future use of the site.

The direct local effects on townscape and visual receptors will be locally significant within the immediate site area introducing substantial yet beneficial change and will be seen to add new elements to the townscape in keeping with the ongoing transformation of the Oak Bank / Garscube Road Commercial District. The development strategy incorporates a comprehensive approach to establishing a strong relationship and interface with the sensitive setting of Speirs Wharf and the Forth and Clyde Canal.

Where effects arise, they will be in relation to the perception of the influence of the new development within the context of a diverse and changing skyline. Whilst significant effects will arise, the introduction of the development will be seen to add drama to the townscape but, whilst remaining sensitive to key features of the existing built form and the sites immediate setting.

The careful approach to the design of the proposed development will assist in reducing adverse effects and will introduce beneficial and positive changes to enhance the immediate area. The TVIA concludes that the influence of additional development is appropriate to the wider townscape setting.

Extensive environmental modelling has also been undertaken on the impact of the proposed development upon the residents of Speirs Wharf. This includes the undertaking of a daylight and sunlight assessment in line with guidance and best practice.

Sunlight analysis of a building can be split into two categories: performance of the proposed design and impact on the surroundings. Daylight analysis refers to calculation of the general illuminance of a space, whereas sunlight access is an analysis of the hours of direct sunlight on a window or amenity space.

The external impact on the surroundings of the proposed development was assessed using guidance in BRE Guide 209: Site Layout Planning for Daylight and Sunlight. Simulations were carried out using Radiance. Impacted windows and areas were identified and the applicable tests were carried out. The results of these studies are summarised below.

Speirs Wharf

The impact of the new development on Speirs Wharf has been classed as negligible. All windows in Speirs Wharf passed the VSC and APSH tests specified by BRE 209. This means that neither the daylight nor the sunlight access to Speirs Wharf will be greatly affected. This is likely due to the orientation of the towers; their perpendicular direction to Speirs Wharf ensures that the total impact on any of the windows is minimal. The lowered sections to the East also help with retaining light to Speirs Wharf; this minimises the obstruction angle of the development given its height and thus ensures more of the sky and sun is visible from the windows of Speirs Wharf.

Houseboats and Moorings

Overall, there was a negligible adverse impact on the daylighting and sunlight access to the moorings at Speirs Wharf. All tested houseboat window locations passed these the VSC and APSH tests as specified in BRE 209. The mooring area itself still receives an adequate amount of sunlight.

Non-residential

Overall, it was judged that the impact of the new development on the surrounding non-residential buildings was minorly adverse.

Royal Conservatoire of Scotland – Wallace Studios

No windows in this building were adversely affected by the new development.

230-260 Garscube Road

One window here failed both the tests applied here, however this window is unlikely to have a high expectation of daylight due to the nature of the building.

12 Burns St

One window failed on this building; however, we believe that the expectation for daylight from this window is low due to the storage nature of the building and the lack of other windows.

22 Farnell St

All analysed windows on this building passed.

Civic House

There were no windows that faced the proposed development on this building.

The proposed development meets the aims and intentions of Policy 7 in full.

Policy 9 ‘Brownfield, vacant and derelict land and empty buildings’ seeks to encourage, promote and facilitate the reuse of brownfield, vacant and derelict land and empty buildings, and to help reduce the need for greenfield development. It states that development proposals that will result in the sustainable reuse of brownfield land including vacant and derelict land and buildings, whether permanent or temporary, will be supported.

Appendix F, NPF4 defines ‘brownfield’ as:

“Land which has previously been developed. The term may cover vacant or derelict land, land occupied by redundant or unused buildings and developed land within the settlement boundary where further intensification of use is considered acceptable.”

In accordance with Policy 9 a), the proposed development will result in the sustainable reuse of brownfield land, in particular, including renovating an existing Scottish Opera building and utilising vacant and derelict land on a permanent basis is to be supported.

In determining whether the site is sustainable, the biodiversity value of brownfield land which has naturalised should be taken into account, along with matters of conserving carbon and contamination etc.

Matters related to ground investigation / mineral investigation and flood and drainage risk have all been assessed and it is an effective and deliverable Scottish Opera headquarters and PBSA site. We trust that GCC will wish to attach standard planning conditions to ensure any necessary works are carried out prior to the commencement of construction works onsite.

The application site is within an urban settlement boundary. By its very nature it complies with Policy 9.

Policy 12 'Zero Waste' seeks to encourage and facilitate development that is consistent with the waste hierarchy. Development proposals should seek to reduce, reuse, or recycle materials in line with the waste hierarchy and will be supported where they:

- I. reuse existing buildings and infrastructure;*
- II. minimise demolition and salvage materials for reuse;*
- III. minimise waste, reduce pressure on virgin resources and enable building materials, components and products to be disassembled, and reused at the end of their useful life;*
- IV. use materials with the lowest forms of embodied emissions, such as recycled and natural construction materials; and*
- V. use materials that are suitable for reuse with minimal reprocessing.*

Scottish Opera is committed to a comprehensive waste recycling policy with clear separation of their waste from both the operational and manufacturing sides of its operation at the Edington Street Production Studios. Separated dry recyclable, cardboard, food, and general waste is stored separately and collected weekly, with glass, metal and timber waste stored separately and collected as required, usually monthly.

The proposed development will seek to incorporate the following:

- The proposed development will look at waste generation and separation at source.
- The proposed development will seek to reduce, reuse, and recycle waste in line with the waste hierarchy.
- Ground levels will be selected to minimise earth movement and balance export/import quantities.
- Contractor to be requested to submit waste management plan to ensure construction waste material is correctly sorted and recycled where possible. This will reduce the volume of waste generated.
- Kitchens equipped with recycling drawers to assist with sorting and storage of recycled material, helping reduce the amount of landfill waste generated.
- Large refuse store to provide bins/ recycling facilities and waste management out of sight and tidy within the building. Centralised and efficient refuse strategy provides easy access for bin collection.
- The project seeks to use materials that are suitable for reuse with minimal reprocessing.
- The development proposes zero direct emission heating supply.

The above will ensure that the principles of Policy 12 are complied with.

Policy 13 'Sustainable Transport' seeks to encourage, promote and facilitate developments that prioritise walking, wheeling, cycling and public transport for

everyday travel and reduce the need to travel unsustainably. Development proposals which are ambitious in terms of low/no car parking will be supported, particularly in urban locations that are well-served by sustainable transport modes and where they do not create barriers to access by disabled people.

Amongst other matters, development proposals will be supported where it can be demonstrated that they:

- I. Provide direct, easy, segregated and safe links to local facilities via walking, wheeling and cycling networks before occupation;*
- II. Will be accessible by public transport, ideally supporting the use of existing services;*
- III. Integrate transport modes;*
- IV. Provide low or zero-emission vehicle and cycle charging points in safe and convenient locations, in alignment with building standards;*
- V. Supply safe, secure and convenient cycle parking to meet the needs of users and which is more conveniently located than car parking;*
- VI. Are designed to incorporate safety measures including safe crossings for walking and wheeling and reducing the number and speed of vehicles;*
- VII. Have taken into account, at the earliest stage of design, the transport needs of diverse groups including users with protected characteristics to ensure the safety, ease and needs of all users; and*
- VIII. Adequately mitigate any impact on local public access routes.*

A Transport Statement has been prepared by Dougal Baillie Associates. The Scope of this Transport Assessment was presented to GCC prior to undertaking this report. The findings of this study are based on a review of the existing site, current traffic observations and transport infrastructure provision and has been produced in accordance with Transport Scotland's document "Transport Assessment guidance" (2012).

As noted, the proposals will allow consolidation of the Opera's existing premises to the new facilities at Edington Street. The existing Head Quarters will relocate from 39 Elmbank Crescent, Charing Cross and a large orchestra and rehearsal space will also relocate from Hillington.

Through the relocation, a maximum of 40 staff will transfer from the current Head Quarters building to the new facilities. The majority of these staff work office-based hours i.e. 9am to 5pm. However, Scottish Opera currently offer Hybrid working to staff, which in general means that on a day-to-day basis approximately 63% of staff will be in the office at the one time, resulting in approximately 25 new staff at the Edington site during the working day.

No additional staff will transfer from the rehearsal building at Hillington as its use is occasional and team members travel here to rehearse from the existing facilities at Edington Street.

The development site is in a highly accessible location with access to good pedestrian, cycle, and public transport networks. The application site is designated in the CDP as an area of 'High Accessibility'. This reflects the site's excellent proximity to public transport, including bus, rail, and underground all within walking distance.

In terms of pedestrians and cyclists, the development site would be permeable to both pedestrians and cyclists. Strong pedestrian connections have been created throughout the development to allow connectivity to the existing cycle and footpath network towards the city centre and also the canal frontage. In doing so, the development

supports both pedestrian and cycle movements. The presence of dedicated walking facilities will help to promote and encourage active travel seeking to support reliance upon alternative modes to the private car, by maximising connectivity and accessibility for all modes, which is a key policy requirement.

In terms of proposed parking provision, the provision of cycle parking has been reviewed against the CDP standards and advice from PBSA operators who are reporting that the uptake of cycle storage by students has reduced. One reason for this could be related to the provision of free bus travel for young people. The current proposals will provide 176 cycle parking spaces and whilst this provision falls below the adopted GCC parking standards provision of 355 spaces given the availability of public transport and active travel accessibility the proposed level will adequately support the likely demand for cycling, without overproviding and detracting from the available amenity and public realm space which is a unique feature of the proposal that will be community accessible and should be embraced.

The PBSA blocks are essentially 'car free' and will provide a total of 4 accessible parking spaces within the student accommodation development block. Parking provision for Scottish Opera has been determined based on operational requirements and delivers a total of 27 standard spaces, 2 accessible spaces provided over Levels 0 and 1, parking area for 4 x HGVs, 1 x Tractor parking space, and 4 x Van parking spaces.

Regards servicing, the development layout has been developed with the amenity, quality of space and the requirements of pedestrians and cyclists before those of motorised vehicles. Notwithstanding, appropriate provision has been made within the development proposals to accommodate development servicing in the form of refuse collection and service vehicles. In terms of Scottish Opera, HGV movements associated with the new building are likely to be in the region of one movement per day associated with orchestra or film rentals. These movements will be accommodated within the service areas accessed via the pends. The HGV manoeuvres associated with the existing building will be unaffected by the development proposals.

In addition, a Travel Plan Framework document has been prepared and is included in Appendix C of the Transport Statement. This Travel Plan focuses on providing student residents and development staff with public transport information.

In conclusion, the development proposals will be accessible by sustainable modes of travel and integrate well with the existing transport network. The development has been designed with the desire to provide more usable public space and support the movement of pedestrians across the site.

The proposed development is in compliance with Policy 13 and promoting sustainable transport.

Policy 14 'Design, Quality and Place' encourages well designed development that makes successful places by taking a design-led approach and applying the Place Principle. Namely:

- **Healthy:** Supporting the prioritisation of women's safety and improving physical and mental health.
- **Pleasant:** Supporting attractive natural and built spaces.
- **Connected:** Supporting well connected networks that make moving around easy and reduce car dependency.

- Distinctive: Supporting attention to detail of local architectural styles and natural landscapes to be interpreted, literally or creatively, into designs to reinforce identity.
- Sustainable: Supporting the efficient use of resources that will allow people to live, play, work and stay in their area, ensuring climate resilience, and integrating nature positive, biodiversity solutions.
- Adaptable: Supporting commitment to investing in the long-term value of buildings, streets and spaces by allowing for flexibility so that they can be changed quickly to accommodate different uses as well as maintained over time.

Development proposals that are poorly designed, detrimental to the amenity of the surrounding area or inconsistent with the six qualities of successful places, will not be supported.

The proposed development and its approach to quality, design and place is outlined in detail within the accompanying Design & Access Statement that notes the rationale on design approach. The proposed development is by its very essence healthy, pleasant, and sustainable and has followed a constructive pre-application process with GCC.

For example, it was agreed at the outset that the development of the site should:

- Recognise and respect the significance of the historic Speirs Wharf buildings in the wider townscape
- Provide physical connectivity between the canal towpath and lower platform level both within new buildings and via new quality public realm.
- Address the canal, providing canalside frontage and uses that contribute to its social vibrancy. Provide uses that give 24/7 activation, and contribute to the life of the local community and increase the attractiveness of the area for visitors.
- Treat all corners of the site with equal importance, activated at ground floor by public use and entrance.

The Applicant has undertaken a thorough local context and character assessment to ensure that a successful and sympathetic place is created. This includes creating a clear development strategy with Scottish Opera at the outset and various design iterations, including testing through the pre-application process collaboratively with GCC.

Following formal discussion with GCC Planners and the City Design Team as part of the pre-application process and analysis of the proposals utilising VuCity city wide modelling, it was agreed with City Design that vertical components to the development were acceptable, and that the massing should enable views to and from Speirs Wharf to not be totally obscured. Whilst some impact on the view was expected, the Wharf range needed to remain visible from key views.

The final strategy placed the lower scale Scottish Opera facility directly behind their current Production Studio between it and the canal retaining wall. This location enabled the new building to tuck behind the existing retaining wall and only pop up with any significance at either end of the building in two flanking pavilions which went no higher than the existing trees on the towpath edge.

This strategy resulted in views to and from Speirs Wharf being maintained along the length of the production studio. The PBSA component of the development was as result of this move split into two 'bookend' blocks – one at each end of the site. These blocks were developed in form to respond to their unique context in two specific ways;

First – the plan form of the blocks was set up and corners chamfered to open up as much view to and from Speirs Wharf as possible. Through VuCity modelling, the east west orientation of the blocks and chamfering of the corners was demonstrated to have significant benefit to the view impact.

Second – the plan form was evolved into two intersecting wings sharing a common central core, enabling each wing to be extruded in height independently. This enabled the wings fronting the canal to be of lower scale, responding appropriately to the context of the canal edge and the scale of the facing Speirs Wharf range of buildings.

The heights of each wing have been adjusted in response to both the pre-application and PAN public consultation processes, reducing the height of the north east wing by two storeys, replacing the lost accommodation on the higher west wings of both the north and south towers.

In terms of inclusive design, as a cultural organisation who tour productions to a number of significant public buildings, Scottish Opera are constantly seeking improvements to their building and services in the context of equality legislation. Broadening engagement with opera and the creative activities that support the art form is a key driver for this capital development project to expand their facilities, thus helping to meet the stated aims of Scottish Opera's EDI policy.

In terms of amenity and open space, this has been well designed to include areas for play, recreation, and relaxation which will have positive health and well-being benefits for residents and community alike, playing a positive role in the regeneration of this part of the city which requires additional vitality.

The proposed external design is intended to become a new focal point for locals and visitors, offering a range of spaces for planned and spontaneous encounters. The key landscape goals for adding to the existing public environment are:

- Improving permeability of the site by adding new physical and visual links to Speir's Wharf
- Activating canal landscape and encouraging regular activities such as markets, water sport competitions and others to take place
- Improving safety and legibility of the site by adding lighting and signage along main access routes
- Fostering learning about local plants, trees and wildlife
- Enabling conversations between different members of the community

A daylighting and sunlight analysis has been carried out and a daylight and sunlight impact report has been provided. In summary, the proposed development effect is considered to be in-keeping with the recommendations of the BRE guidelines.

In terms of PBSA adaptability, our building design recognises the importance of future adaption and our approach considers a future building user. For example, columns could provide an open plan layout and the non-load bearing partitions can be

repositioned to meet the needs of an alternative building use. Adaptability proposals for future residential use are illustrated within the Design & Access Statement.

The proposed development complies with the six qualities of place and Policy 14.

Policy 15 ‘Local Living and 20 Minute Neighbourhoods’ and **Policy 16 ‘Quality Homes’** can both be read together given the nature of the proposed development.

Policy 15 seeks to encourage and promote 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. This will include a network of high-quality, accessible, mixed-use neighbourhoods which support health and wellbeing, reduce inequalities and are resilient to the effects of climate change.

Critically, the hallmarks of a 20-minute neighbourhood is for both new and existing neighbourhoods to include accessible housing options and housing diversity, which the PBSA proposed development would offer.

We have set out our proposals aligned to the Local Living and 20-minute neighbourhood’s policy principles. This has included reference to the abundant resources around the site which are easily accessible. Where there is improvement to be made, we propose such, for example improved links to the canal towpath.

This development also sits in the context of a masterplan for the wider area which promotes 20-minute neighbourhood policies through mixed use, provision of services across the area and easily accessible facilities for all. Our proposals for Scottish Opera site should be considered in the context of the overall masterplan.

The 20-minute neighbourhood concept outlines a flexible approach to assessing places against the concept of local living. The localism agenda raised in popular parlance from the COVID era of living locally. A method of achieving connected and often compact neighbourhoods designed in such a way that people can meet most of their daily needs within a reasonable distance of their home preferably by sustainable and active travel methods arose and is commonly referred to as the 20-minute neighbourhood.

This principle can be applied in the context of the wider masterplan and proposed developments of small community streets and spaces. Housing developments, in all its quasi forms, are planned to significantly reduce the need to use unsustainable methods of travel, to prioritise quality of life, help tackle inequalities, increase levels of health and wellbeing and respond to the climate emergency.

Speirs Wharf proposals create a well-planned place informed by its context – historic, cultural, and social. It is an accessible developing, supporting health and wellbeing and is resilient to climate changes impacts. Planting species for instance are climate resilient and drainage has been designed to accommodate the predicted changes. The local infrastructure requirements are addressed and support the community.

Therefore, our proposals align with Policy 15.

The proposed development is located within a highly accessible location, which is well serviced by the full list of amenities and community facilities expected in such a setting. The mix of accommodation has also been carefully curated to ensure it meets student needs and make a positive contribution to local living and as part of wider 20-minute neighbourhood.

Using the App 'TravelTime', the Design & Access Statement generates a map illustrating the extents of 5, 10, 15 and 20min walking times from the centre of the application site. This demonstrates that within a 20min walk, residents will be able to access the heart of the city centre to the south, along the Great Western Road to the River Kelvin to the west, and Sitehill to the east. This also illustrates proximity to education, healthcare, health and fitness, mind and spirit, and amenity and open space facilities within 20 minutes of the application site.

For example, there are a few large parks in the vicinity such as Cowlairs Park, Claypits, Ruchill Park and Sighthill Park which offer extensive green areas that can be enjoyed throughout the year. Within the parks, there are playgrounds and opportunities for gathering.

The proposed development will increase much needed footfall and consumer spending by uplifting the resident population and will establish an active frontage onto the building that will enhance its regenerative qualities in terms of placemaking.

The application site has excellent public transport links in close proximity, including bus stops and train stations within walking distance. With the above, the proposed development is suitable for residents of all ages.

Policy 16 seeks to encourage 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.

Policy 16 states 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. The policy states:

- a) Development proposals for new homes on land allocated for housing in LDPs will be supported.
- b) 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.
- c) 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 could include amongst other things a range of size of homes such as those for larger families, accessible homes, and affordable, and homes for people undertaking further and higher education.
- e) Development proposals for new homes will be supported where they make provision for affordable homes to meet an identified need. Proposals for market homes will only be supported where the contribution to the provision of affordable homes on a site will be at least 25% of the total number of homes, unless the LDP sets out locations or circumstances where:
 - I. a higher contribution is justified by evidence of need, or
 - II. a lower contribution is justified, for example, by evidence of impact on viability, where proposals are small in scale, or to incentivise particular types of homes that are needed to diversify the supply, such as self-build or wheelchair

accessible homes. The contribution is to be provided in accordance with local policy or guidance.

- f) Development proposals for new homes on land not allocated for housing in the LDP will only be supported in limited circumstances where:
- i. the proposal is supported by an agreed timescale for build-out; and
 - ii. the proposal is otherwise consistent with the plan spatial strategy and other relevant policies including local living and 20 minute neighbourhoods;
 - iii. and either:
 - delivery of sites is happening earlier than identified in the deliverable housing land pipeline. This will be determined by reference to two consecutive years of the Housing Land Audit evidencing substantial delivery earlier than pipeline timescales and that general trend being sustained; or
 - the proposal is consistent with policy on rural homes; or the proposal is for smaller scale opportunities within an existing settlement boundary; or
 - the proposal is for the delivery of less than 50 affordable homes as part of a local authority supported affordable housing plan.

It is appreciated that the application site is not an allocated 'housing' site in the CDP. However, there is an identifiable need for additional student bed spaces in Glasgow and the proposed development will assist in meeting this living requirement and identifiable gap in student accommodation which is a type of residential accommodation referenced within Policy 16 criterion C. This will enable a diverse, inclusive, and sustainable City and on an appropriate vacant site, that will have a positive impact upon the streetscene.

Based on the Savills student needs assessment report, which accompanies this application, there is a clear unmet demand from full time students in Glasgow for PBSA. In order to ensure that Universities can attract students across Scotland and internationally there is a responsibility on all sides, including GCC, to ensure there is an adequate supply of student accommodation. It is clear that this is not currently the case.

Managed PBSA also allows students that currently occupy Houses of Multiple Occupation ("HMO") to vacate these properties and free up stock for a wider range of tenants that could include families.

There are no negative local infrastructure impacts. GCC's aspiration for more living offers, and to double the city centre population by 2035, will absolutely be improved with the proposed development.

The proposal sits on established cycle routes. It provides a safe, accessible, and well-connected movement network for pedestrians along activated street frontages.

The landscape proposals seek to provide quality amenity and improve site biodiversity and climate change benefits, through a variety of plant species (see Design & Access Statement).

Overall the community benefits will be positive.

In terms of 'statement of need', this is evidenced within this Planning Statement with reference to the urgent need for additional student bed spaces and need for additional choice; and the reduction in pressure on private rented and HMO properties, and hence improving private for sale supply.

In addition, the economic impact and social value impacts have been assessed, and has highlighted a number of important benefits at the local level. These tangible benefits should be read in full.

The principle of a Scottish Opera Headquarters, with all of the significant employment and regeneration benefits and PBSA is accepted, as it is a sympathetic land use and will make a positive contribution to the locale regards economy, employment, community and sustainability benefits, regeneration and townscape repair, and genuine housing mix offer.

It complies with the principles of Policy 15 and 16 of NPF4.

Policy 18 ‘Infrastructure First’ seeks to encourage an infrastructure first approach to land use planning, which puts infrastructure considerations at the heart of placemaking.

The impacts of development proposals on infrastructure should be mitigated and they will only be supported where it can be demonstrated that provision is made to address the impacts on infrastructure.

Due to its nature and scale, the proposed development will not require any significant infrastructure provision. For example:

- Education – there is no education policy or contribution in the extant CDP and the proposed development will not impact upon education infrastructure.
- Roads and Transportation – the proposed development will not have detrimental implications for off-site transport infrastructure and there is to be no impact upon pedestrian routes. The site is located close to higher education facilities and public transport infrastructure.
- Community facilities – this include community halls, sports grounds, sports halls and centres, libraries and community health and care provision. The proposed development will not impact detrimentally upon these facilities. Indeed, the inclusion of significant community accessible open spaces with a purpose, community accessible café and gym, permeability, and additional population will assist in providing additional footfall and revenues, including the local area which requires investment and population.

The exception is the requirement for open space facilities and these are addressed in detail under Policy SG10 below. The proposed development provides sufficient student resident amenity space.

The proposed development complies with Policy 18.

Policy 19 ‘Heating and Cooling’ intent is to encourage, promote and facilitate development that supports decarbonised solutions to heat and cooling demand and ensure adaptation to more extreme temperatures. Please refer to the Energy & Sustainability Statement and comments on Policy 1 and Policy 2 above and Energy Statement regards proposed sustainability approach.

It has been demonstrated that the proposed development is in compliance with Policy 19.

Policy 20 ‘Green and Blue Infrastructure’ seeks to seeks to protect blue and green infrastructure as an integral part of design and development processes, and designed to deliver multiple functions including climate mitigation, nature restoration, biodiversity

enhancement, flood prevention and water management. It also seeks to ensure that communities benefit from accessible, high quality blue, green and civic spaces

The primary goal of this development is to redevelop a disused brownfield site for a complementary use. The proposed development will not lead to the loss of blue or green infrastructure, and indeed, with the proposed biodiversity and green landscape enhancements, with a clear maintenance programme, including planting, there will be tangible betterment, including through the use of blue infrastructure proposed for surface water retention on the roof terrace.

The inclusion of amenity space and biodiversity benefits supports the principles set out in Policy 20.

Policy 22 ‘Flood Risk and Management’ seeks to strengthen resilience to flood risk by promoting avoidance as a first principle and reducing the vulnerability of existing and future development to flooding.

The policy states that development proposals at risk of flooding or in a flood risk area will only be supported if they meet certain criteria, including water compatible uses.

Development proposals should demonstrate that they will:

- I. not increase the risk of surface water flooding to others, or itself be at risk.*
- II. manage all rain and surface water through sustainable urban drainage systems (SUDS), which should form part of and integrate with proposed and existing blue green infrastructure. All proposals should presume no surface water connection to the combined sewer;*
- III. seek to minimise the area of impermeable surface.*

A Drainage Strategy Report and Flood Risk Assessment has been undertaken. Both have paid cognisance NPF4 and is compliant in its assessment, including climate change.

The Flood Risk Assessment has considered the risk of flooding to the site from a range of sources including coastal, fluvial, pluvial flooding/overland flows, groundwater flooding and sewer flooding. It has been concluded that the site is not at risk of flooding from sea, fluvial, groundwater, surface water and local drainage.

In line with NPF4, the site lies outwith the future risk of flooding from all sources and is therefore considered to be suitable for the proposed development. Dry emergency pedestrian and appropriate vehicular access to the site will be available through Sawmillfield Street, Edington Street and Corn Street for the design storm event.

A suitable drainage strategy to meet the requirements of relevant authorities has been produced, including matters related to Sustainable Urban Drainage Systems and suitable discharge.

The proposed development complies with Policy 22 on flood risk and water management, and trust that standard planning conditions will be applied as necessary by GCC.

Policy 23 ‘Health and Safety’ seeks to protect people and places from environmental harm, mitigate risks arising from safety hazards and encourage, promote and facilitate development that improves health and wellbeing.

Development proposals that will have positive effects on health will be supported. Proposals should not have a significant adverse impact on air quality or noise, or have a significant adverse effect on health.

All matters related to Policy 23 are addressed within this Planning Statement. The proposed PBSA development has incorporated areas of play, recreation and relaxation for the well-being of residents and users alike.

Max Fordham has been appointed to carry out a noise impact assessment in relation to the proposed mixed-use development. As part of the noise impact assessment, an environmental noise survey was required to establish the existing ambient noise levels in the vicinity of the nearby noise sensitive receptor.

To establish baseline noise conditions, a set of short-term spot measurements and a long-term noise survey were carried out on-site. Results of the representative existing ambient noise levels and background noise levels are used to set out targets in compliance with relevant planning conditions and guidance.

It was found that daytime plant noise emissions are expected to comply with the proposed noise rating level limit and therefore represent a low impact at the nearest noise sensitive receptor.

Night-time plant noise emissions and daytime emergency plant noise emissions will be kept within the proposed noise rating level limit by being provided with a degree of acoustic intervention. This will include high performance acoustic enclosures for emergency generators and pump sets and either attenuating screens or acoustic louvered enclosures for heat pumps.

The Applicant will comply with the above.

Limited car parking and no combustion plant are planned, and the energy strategy proposes the use of air source heat pumps therefore the development will have an insignificant impact on local air quality.

Lastly, as noted throughout this submission significant community accessible open space is to be provided, as well as for residents and users of the Scottish Opera building. The health benefits from this are unquestionable.

The proposed development will not have a detrimental impact upon residential and neighbouring amenity, and in converse, will have material benefits regards health and safety. For that reason, it complies with Policy 23.

Policy 24 'Digital Infrastructure' seeks to encourage the rollout of digital infrastructure across Scotland to unlock the potential of all our places and the economy. Development proposals that incorporate appropriate, universal, and future-proofed digital infrastructure will be supported.

The proposed development, both the Scottish Opera Headquarters and PBSA, is a state of the art offer with the well-being of residents and occupants at its centre, and this includes the use of digital technology.

An additional key policy outcome is support for local living, local working, and reduction in the need to travel.

The creation of a new, fully sound proofed production facility in the centre of Glasgow will certainly benefit the local TV production sector. This also connects to the

nearby Glue Factory which is seeking to develop new smaller spaces for a range of production uses, creating a mini production hub at Spiers Locks.

The proposed PBSA development in particular fundamentally supports local living and reduced travel given its proximity to Universities and Higher Education faculties.

The proposed development complies with Policy 24.

Policy 25 ‘Community Wealth Building’ promotes the building a wellbeing economy at local, regional and national levels. This includes proposals which contribute to local economic priorities and reducing inequalities, and proposals linked to community ownership and management of land.

As examples, the policy states this could include improving community resilience and reducing inequalities; increasing spending within communities; ensuring the use of local supply chains and services; local job creation; and supporting community led proposals.

EKOS has been commissioned by Scottish Opera to carry out a socio-economic impact assessment of the proposed development, a mixed-use development. The aim of the document is to quantify the potential economic and social impacts and benefits that could be generated from the development, as well as capturing Scottish Opera’s current value to the City of Glasgow.

At present Scottish Opera employs a considerable number of people (circa 165 FTE) in Glasgow and the wider area. Benefits are generated directly from salaries, as well as indirectly (through the purchase of good and services) and induced (Scottish Opera workers spending their salaries in the economy). Without the ability to develop a dedicated new space for their employees, Scottish Opera may consider moving out of Glasgow in order to find a location where they can consolidate their operations under one roof.

The specific economic benefits of Scottish Opera to Glasgow, and indeed Scotland as a whole, is highlighted within the social economic report and should be read in full.

However, the cultural and community benefits are just as critical.

The cultural sector plays a central role in Glasgow’s civic and economic narrative. It was culture that drove the city’s post-industrial reinvention, and it continues to be a critical part of Glasgow’s reputation as a modern, vibrant and outward looking city. The jewels in the crown of Glasgow’s cultural sector are the national performing arts companies, four of which are located in the city. Scottish Opera is the largest, and its importance both to the cultural ecology of the city and to Glasgow and Scotland cannot be overstated.

Scottish Opera is a production powerhouse, which entertains, inspires, surprises educates, challenges and delights audiences old and new by delivering high quality opera throughout Scotland, the rest of the UK, and internationally. It creates employment for around 700 people each year across all areas of the business from administration through production to performance and its 60th anniversary in 2022 saw the company play an important role in the international opera landscape, garnering Scotland (and Glasgow) worldwide recognition for high-end creativity.

The company’s education programmes are regularly praised for their reach and impact and demonstrate the wider social impact of the company beyond its main performance programme. Last year the education programme engaged almost 40,000 people

across Scotland, and the proposed development will provide new facilities for education work in Glasgow.

Standstill funding levels, increasing costs and the challenges of Brexit and the pandemic have continued to exert pressure on the company, and are, at least in part, drivers of the proposed consolidation at New Rotterdam Wharf. The project will enable Scottish Opera both to consolidate its estate and generate additional income through wider uses of its facilities. This will help to sustain the company for the longer-term future.

This is crucial for Glasgow. Scottish Opera needs to find a site and the clear preference is for Glasgow. However, if not possible the company may be forced to look outwith the city for suitable opportunities. This would certainly be to the detriment of the city's cultural sector, and retaining the company in the city for the longer term should be a priority.

The proposal also creates facilities that will contribute to the success of the wide creative industries, most notably screen and music. Screen production has long been a key component of Glasgow's creative sector and has been given a recent boost with the establishment of new production facilities at the Kelvin Hall. However, growth in production activity in recent years has created pressure on the availability of smaller production spaces. The result is that companies are regularly forced to make use of sub optimal spaces in industrial parks and similar, or may even seek space outwith Scotland.

In summary, the proposed development provides many community benefits, and the quality of the new public realm and amenities will be a unique community resource. The development will be available to be enjoyed by neighbours and visitors from across the city. This will include but not be limited to:

- Community spaces for activity, including voluntary groups and meeting space
- Enhanced relationship with primary education providers in North Glasgow via the Scottish Opera Education & Outreach programme delivered in the new Education Room
- Proposed café with enhanced views across Glasgow
- Public amenity spaces including accessible roof top garden
- Improved relationship with canal towpath including way finding and access
- The potential for ancillary commercial uses, including retail, health, or leisure.
- Performance spaces available for the city to utilise
- Recording facility available for the Scottish film and audio sector

In terms of regeneration, the application site is a brownfield post-industrial site which has been unused for many years. The Scottish Opera project will bring the site back into productive use, significantly improving the public realm and reducing urban blight. This alone will make a direct contribution to the city's regeneration objectives.

More broadly, one of the main opportunities highlighted in the Glasgow North Strategic Development Framework is the strengthening of Speirs Locks as a creative hub area, which is identified as an area of significant economic opportunity within the Glasgow

North area, particularly for the creative sector. In addition to Scottish Opera, the area is home to the Royal Conservatoire of Scotland and the National Theatre of Scotland as well as the Whisky Bond, Scotland's largest creative workspace, and Civic House and the Glue Factory.

However, the area's development has been proceeding incrementally, and Scottish Opera's proposals offer the opportunity for genuinely transformational change to the regeneration of Speirs Lock and the surrounding area.

As covered in the economic impact section, both Scottish Opera's new facilities and the PBSA developments will greatly increase local footfall, creating opportunities for local services and businesses as well as bringing new vibrancy to the area.

The creation of production facilities for screen and music also brings new creativity to the area and is a strong fit with the existing activities of both the Glue Factory (which is developing its role as a creative hub) and the Royal Conservatoire.

The creation of new public space will also benefit existing and new residents, providing opportunities for cultural and leisure activities which can improve community and individual wellbeing. For example, outdoor areas can be used for performances and cultural events during the summer months, bringing more people to the area and contributing to the overall quality of life that area offers.

Other community wealth opportunities from the PBSA developments include:

- It is vital that Glasgow seeks to continue retaining graduates and ensure that economic growth and skilled labour is not limited. Having modern, fit for purpose student accommodation will assist in this regard as it will attract students to the City.
- Managed PBSA will free up HMO stock in the City for a mixture of residents, including families, and alleviate pressures on other housing sectors.
- The proposed development will attract more population and footfall to the City Centre to enhance vitality and benefit local businesses with a daytime and night economy and increase spending.
- Will assist in sustaining the City and be a positive catalyst for regeneration.

The proposed development is in accordance with Policy 25.

GLASGOW CITY DEVELOPMENT PLAN 2017

The Glasgow City Development Plan ("CDP") was adopted in 2017. Along with its accompanying Supplementary Guidance ("SG") and Interim Planning Guidance ("IPG"), it remains extant at the time of writing.

Key Aims of the Plan

The key aims of the CDP are "*Creating and maintaining a high-quality healthy place*" and "*Developing a compact city form that supports sustainable development*" (Page 17).

It is considered that the proposed development is in line with these CDP 'aims.

CDP Strategic Outcomes

The CDP 'Strategic Outcomes' are noted below followed by a note on how the proposal seeks to support and deliver these strategic outcomes. These outcomes provide a rationale for the CDP policies and proposals.

- A vibrant place with a growing economy → this outcome seeks to reinforce the City as being at the centre of Scotland's economy, with support for new investment and employment opportunities and local communities are rejuvenated. The redevelopment of the long term vacant and brownfield site will assist in this regard.
- A thriving and sustainable place to live and work → this outcome seeks to achieve a City that is made up of sustainable, vibrant, and distinctive places which are well designed, accessible, and amongst other matters provide for a growing and diverse population. The Applicant has applied an exemplar placemaking approach and the proposed design framework is very much in line with this principle. The proposed development is well designed, providing active frontages, with appropriate materials which reflects the site's heritage, and supporting neighbourhood living, that people want to work, live and visit.
- A connected place to move around and do business in → the proposed development is in a location which is accessible by sustainable means therefore supporting active travel and public transport considerations
- A green place → the proposed development contributes towards a high environmental and biodiversity quality, with planting and landscaping, open space, and amenity for resident and community access.

It is demonstrated that the proposed development supports the strategic outcomes and objectives set out in the CDP. It is considered that a balance has been struck between the 4 outcomes and this is further demonstrated within the Planning Statement and supporting information.

City Development Plan – Site Specific Policies

Given that there has been a detailed assessment of the proposed development against NPF4 above and generally under the same policy topic matters as those covered under the CDP, it is not proposed to revisit the policy assessment. However, further comments are provided as necessary with a focus placed on principle of development matters.

Under the CDP, the following site specific matters cover the application site:

- Within the City boundary
- CDP 1 'Placemaking Principle'
- CDP 2 – 'Sustainable Spatial Strategy'
- Economic Development Area
- Part of the proposed application site is 'white land' commonly found to reflect established residential locations.

The proposed development will be assessed against the following as key policies of consideration:

- CDP 1 & SG 1 - 'Placemaking Principle'
- CDP 2 & SG 2 – 'Sustainable Spatial Strategy'
- CDP 3 & SG 3 – 'Economic Development'
- CDP 5 & SG 5 – 'Resource Management'
- CDP 7 & SG 7 – 'Natural Environment'
- CDP 8 & SG 8 – 'Water Environment'
- CDP 9 & SG 9 – 'Historic Environment'
- CDP 10 & SG 10 'Meeting Housing Needs'
- CDP 11 & SG 11 – 'Sustainable Transport'
- CDP12 & IPG 12 – 'Delivering Development'

Policy CDP 1 and SG 1 'Placemaking Principle' is an overarching policy and seeks to improve the quality of development taking place in Glasgow. This policy is underpinned by the six qualities of place as defined in Scottish Planning Policy and supported through SG. Namely:

- It is distinctive;
- It is safe and pleasant;
- It is easy to move around and beyond;
- It is welcoming;
- It is adaptable; and
- It is resource efficient.

The Applicant has sought to achieve the highest standard of design whilst respecting the City's heritage. Further detail in this regard is contained within the Design & Access Statement.

Key principles of this policy include promoting character and identity; inclusion of successful open space; design solutions should aid legibility and general understanding of the urban environment; create ease of movement and a clear understanding of hierarchy; contribute to the existing vibrancy and diversity of an area; and demonstrate the highest standards of sustainable design and construction and respond and adapt to changing circumstances.

The proposed development has responded to these principles in a number of ways:

- Creating an appealing place to stay, visit and do business.

- To create a unique and attractive environment that respects the locations character, and to improve upon the urban and historic environment.
- To contribute positively to the townscape on an immediate, medium, and long-distance views.
- To create legible, readily understandable, and adaptable buildings to meet present and future needs.
- Whilst not located within a Conservation Area, to respond to the wider historic character of the area.
- To make a major contribution to the public realm offer by providing high quality amenity through a series of spaces, many of which are community accessible.
- Promoting community uses such as cafés and gym.
- Promote active travel and public transport (minimising use of private car).
- Promoting materials and elevation treatment that positively contribute to the architectural quality and heritage of the locale.
- Comprehensive redevelopment of a brownfield site.

Focusing primarily on those areas that are relevant to the proposed development, key design matters are Inclusive Design; Community Facilities; Development of Brownfield Sites; Residential Development; Amenity; Detailed Design; and Public Realm.

Inclusive Design

As a cultural organisation who tour productions to a number of significant public buildings, Scottish Opera are constantly seeking improvements to their building and services in the context of equality legislation.

The new facilities will better support all performers and staff and provide enhanced spaces from which Scottish Opera can deliver their Education and Outreach programme. The new facility will better reflect the values of this important cultural organisation.

The ambition is that Scottish Opera can better support their existing activity which includes, but not limited to:

- The Dementia choir – supporting those with memory loss and / or reduced mobility
- Accessible and relaxed performances at the Theatre Royal and other touring venues.
- Baby O – workshops for the very young
- Education workshops with local schools
- Development of small-scale work to tour to smaller venues around Scotland.

During the development of the proposals key staff have been consulted to ensure that the proposal will address operational challenges currently faced in the existing

buildings. As the proposals develop further consultation will be held with both staff delivering the education programme and people with lived experience (disabled people, neurodiversity and older people) to explore how the new facilities can best support their Education and Outreach programme.

With inclusive design at its heart, the proposed development has been designed and will be constructed to make provision for the access of people with disabilities including the provision of barrier free access.

Considerations of access for those with special needs are an integral part of the overall design approach and in accordance with the latest legislation and good practice guidance. This includes:

- The Equality Act 2010
- Standard 4 of the Technical Standards
- The Disability Discrimination Act (DDA) 2005
- BS 8300: 2009 – ‘Design of Buildings and their Approaches to meet the needs of Disabled People
- Executive Planning Division Planning Advice Note – PAN 78: ‘Inclusive Design’
- General accessibility with particular focus on the surrounding context

The development site is well connected within City public transport network and access to the site is therefore good. Bus stops are located adjacent to the site. The site is well located for all manner of amenity and services in the adjacent area.

In terms of external works, any pedestrian routes which require a change in level will incorporate surface treatments to provide easy and safe access as per the Technical Standards.

The new Public Realm is designed in accordance with Inclusive Design requirements set out in Glasgow City Council Supplementary Guidance 1 – The Placemaking Parts 1 & 2 and BS8300-1:2018. The measures to create accessible and inclusive external environment include:

- Wheelchair Parking bays within 45m from building entrance
- Step-free access to all main entrances to PBSA and Scottish Opera buildings
- Sufficient path widths to allow for convenient passing
- Logical layout with clear sightlines
- Provision of integrated bike ramp for sections of stepped landscape
- Provision of covered and secure cycle parking for PBSA blocks as well as standard and nonstandard visitor cycle stands as part of external environment to promote sustainable transport and alternative modes of mobility

In addition, there is an approximately 8m height difference between street level and towpath that is currently bridged with a small set of stairs at the top of Sawmillfield Street. Due to this topographic constraint, creating ramped access at both ends of the

development would compromise the design of the external environment and offer minimum benefits to the existing public realm. Therefore, the design offers a combination of external and internal solutions to create accessible routes across the different levels of the development, such as:

- Compliant route to the Ground Level of all buildings from Edington Street
- Wheelchair parking at the intermediate level with compliant access to Level 1 of all buildings
- Compliant route connecting towpath level to Level 3 of all buildings
- External platform lift to access walled garden space
- Internal lift access to all levels of external landscape

The proposed development is intended to become a new focal point for locals and visitors, offering a range of services and spaces for planned and spontaneous encounters. Inclusive design is at the very centre of the proposals as a community accessible resource open to all.

Community Facilities

The term community facility is wide-ranging and covers a range of types and scale of facility. For the purposes of the CDP and SG1, community facilities are defined as 'facilities which provide for the health and well-being, educational, recreational, leisure, spiritual and cultural needs of the local community'.

In terms of the proposed development, it complies with this principle by allowing for formal and informal seating areas and various types of amenity, the inclusion of community accessible cafes and gym.

By its very essence Scottish Opera is community hub, and the model proposed is also one that encourages social interaction between its users, PBSA residents, and the general public on both an informal and formal basis and outlined in detail within the Design & Access Statement and sections above of this Planning Statement.

Development of Brownfield Sites

SG 1 states that Glasgow has consistently had the highest concentration of vacant and derelict land of any local authority in Scotland. The impacts of this regards placemaking is it is widely recognised that significant amounts of vacant and derelict land generates a negative image of the City, for both residents and visitors. This can adversely affect environmentally sensitive activities such as tourism and inward investment.

To address this, GCC will engage with the private sector to address constraints to development of vacant and derelict sites.

The proposed development site is brownfield and will provide increased diversity and vitality to this part of the City that has very much been a missing gap site for regeneration for well over a decade. It will provide economic growth that is in line with the aims and objectives of CDP and investment in developing this underutilised site is an investment in the cultural fabric of the city and supports Scotland's future.

Residential Development

It is important to note that within the City Centre Strategic Development Framework 2021, and Cowcaddens District Regeneration Framework December 2022, the application site is located partly within the 'City Centre' boundary. This is an important context for the site and how it should be assessed in line with planning policy, and key material documents.

GCC has published its Glasgow City Centre Living Strategy Glasgow Vision 2035 and its overarching aims is *"to enable a sustainable, inclusive and diverse city centre population."* To achieve this GCC have established a set of key objectives, including increasing the city centre's population from just over 20,000 to 40,000 by 2035. This is an ambitious target and the proposed development will play an invaluable residential role its achievement.

In terms of residential development and placemaking principles, GCC seek to promote the delivery of high-quality residential environments that are informed by a design led approach, creates a safe and integrated neighbourhood that offers a choice of movements and travel, and encourage distinctiveness.

The principle of PBSA at the application site is appropriate and is not within an area of over-concentration. It will not undermine the character of the area.

Residential layouts, including PBSA, should seek to maximise daylight & sunlight, prevent overlooking, make appropriate servicing, and refuse recycling areas, incorporate a Sustainable Urban Drainage System strategy, and ensure sufficient permeability.

The application site is challenging, however, the design team has embraced these challenges. Through the pre-application process there has been significant revisions made to the proposed development, in collaboration with GCC Planning Department.

These include:

- Completely revising the development strategy for the site, placing the Scottish Opera building at the centre of the site, tucked behind the large canal retaining wall and only raising above the towpath level in two low scale pavilion structures that would not extend higher than the existing tree line. The larger PBSA elements were moved to the north and south ends of the site – 'bookending' the development – with the block orientation and profile carefully considered and modelled in order to maximise the views of Speirs Wharf residents.
- The blocks have been orientated east west, such that the slender gables face the Speirs Wharf terrace, thus maximising the open space (and resulting views) to and from Speirs Wharf. The block sides have also been chamfered in plan, thus increasing the visual sightlines to and from Speirs Wharf.
- The scale of the northern canalside block has been reduced by two storeys, to be 10 storeys above towpath level (the southern canalside block being seven storeys above towpath).
- The orientation and massing of the blocks has been carefully considered to mitigate impact on the canal and Speirs Wharf elevation, with the summer evening shadow being limited to the slender elevation of both blocks. A full and

detailed daylight and sunpath analysis has been carried out and submitted as part of the planning application.

- The original design intent for the gable ends was to include a significant amount of glass within the stair tower and lounge spaces. In light of the comments received, the design of the gable ends has been revised to reduce the quantum of glazing to reduce the impact of overlooking direct onto Speirs Wharf.
- Quality meaningful external and internal amenity has been incorporated in a variety of spaces throughout the development. This will include a gym (which will be open to public membership) and an open café space/spaces. In addition, the Scottish Opera building itself will have a publicly accessible roof top garden that will be able to be accessed during normal working hours and at weekends, for the enjoyment of the existing community and new student population alike. There is no reliance on the existing towpath edge to provide the policy requirements for amenity space, but the fact remains that the canalside will provide significant amenity value for the population arising from the development.
- Acknowledging the issue of local service provision, the design team have revised the design of the north PBSA block to include a commercial unit at ground floor. This space may be used as a retail general store or occupied by a public service function (i.e. GP/Dentist). This ultimately will be demand led, but commitment is there for the allocation of space.
- We have provided a low carbon design and have included meaningful integration of nature-based solutions and sustainable urban drainage.
- In addition, we have demonstrated flexibility/adaptability of building programme to cater for potential future changes of use from PBSA to residential.

In terms of residential density, SG 1 seeks to ensure that all new development has an appropriate urban scale and townscape form which will either consolidate or enhance the surrounding environment and contribute towards creating high quality and sustainable environments. Key principles to be considered are location; context and setting; the scale and massing of adjacent buildings; and public transport accessibility and active travel opportunities.

The proposal is located within an area where higher density developments will be generally appropriate.

SG 1 'Tall Buildings' seeks to ensure that proposals for tall buildings fulfil GCC's aspirations to be of excellent architectural quality in their own right, and enhance the City's skyline and international image. They are also to be restricted to locations that can accommodate their dominant built form, that protect areas of sensitive urban character, and achieve excellent design quality.

The proposed development has been screened for EIA development and whilst an updated response has yet to be received at the time of writing, there is precedent set for tall buildings in the locale and a comprehensive suite of focused supporting studies have been identified in collaboration with GCC.

Policy DES 11 goes on to state that *"Regardless of the need for an Environmental Statement, all proposals for tall buildings, whether at the preliminary or planning application stage, shall be accompanied by a Townscape Statement which provides a detailed analysis and appraisal of the site's context, a reasoned expression of the*

proposal's design aspirations and a quantification of its impact on the City." (SG 1, Page 84). The scope of the statement shall address topics such as contextual analysis, strategic views, design standards, permeability, weather and micro climate, sustainability and green credentials, access and public transport, and servicing.

During early pre-application discussions with GCC on the proposed development, the rationale for height and layout has been through various scenario testing and was welcomed by GCC. The design team completely revised the development strategy for the site and the larger PBSA elements were moved to the north and south ends of the site – 'bookending' the development – in order to maximise the views to and from Speirs Wharf.

This massing and modelling was tested and presented to GCC, and agreed as the appropriate strategy.

The Design & Access Statement provides a design strategy for the height, scale and mass, and a landscape and townscape assessment has been undertaken. This includes strategic views and has allowed for a baseline datum/height for the proposed development to be followed.

The design approach provides a sense of prominence and civic scale and would help to reimagine this urban quarter. This builds on the varied yet cohesive architectural context that surrounds the site with buildings designed in the round.

This strategic design process has concluded that whilst the proposed development is considered to be of height, it is designed to make a positive contribution to the local skyline and to not cause interruption to strategic views in or out, or across the wider area. This localised visual impact is demonstrated within the TVIA assessment.

The Applicant has also instructed a wind study to be undertaken. This examines the wind effects generated by the buildings themselves, and by their context (i.e. the surrounding buildings and the macro-scale wind environment). This assessment enables all of the potential wind problems around the site to be identified. These areas are then considered in terms of the suitability for their intended pedestrian usage. Where appropriate, a range of wind amelioration measures are discussed that are commonly used to reduce the winds to levels that are suitable for their intended purpose. This study has concluded that the scale, mass and density of the proposed buildings will not be environmentally detrimental.

GCC have a preference that tall buildings contain a mix of uses rather than rely on a single use alone. Vibrancy and vitality are a fundamental component of the Scottish Opera and PBSA offer and they have actively pursued a genuine mixed use development. In terms of the proposal, this includes active commercial frontages and ground floor amenity uses that are open to the public.

Lastly it is accepted that tall buildings must be flexible and future proofed. All the buildings proposed, including tall ones, are designed as such that there can be a future change of uses. The Design and Access Statement illustrates how the PBSA blocks can, if required, be converted into mainstream residential flats.

Regards [Amenity](#), this covers a variety of matters within SG 1, including air quality, noise, outdoor and indoor play, and community safety.

Regards issues of noise, sunlight and daylight, and privacy, these have all been assessed as part of the design process. Supporting studies evidence that these matters are acceptable and can be achieved on-site.

An air quality assessment is being undertaken to comply with the requirements of SG 1 and evidence that the proposed development will not result in the deterioration of air quality regards construction, road traffic and impacts upon residential properties.

In terms of Scottish Opera and PBSA resident's amenity, this is outlined in detail within the Design & Access Statement and assessment of NPF4 above.

The design aims to provide a full suite of internal facilities and experiences within the building, that are high quality, well managed and accessible to all users. The design of the accommodation allows PBSA residents to enjoy a variety of social multifunctional spaces such as social lounge, private dining, games zone, tv lounge, cinema, and study areas.

In terms of external amenity spaces, as noted there are six main areas of open spaces: Corner Plazas at Edington Street, pend courtyards, North and South Landscape Steps, PBSA plazas at towpath level, Walled Garden and PBSA roof terraces. This strategy is outlined further below.

Corner Plazas

North-West Plaza

The North-West plaza will offer a connection between the street level and entrance to the PBSA block with an opportunity to act as a spill-out space from the ground level of building. The central area of the plaza can accommodate temporary events for both the public and residents. The plaza has been designed to feature pockets of seating and rest points, enclosed by planting and rain gardens.

South-West Plaza

The South-West plaza will provide level access to PBSA from the public routes, seating areas and an unobstructed vehicle route to the adjacent service yard. The plaza will feature planting suitable for the south-facing landscape, which will also assist with site drainage. By creating a terraced landscape with steps and ramps, the design will provide an accessible route and public space whilst accommodating the existing levels.

Courtyards

North Courtyard

Providing a mixed-use zone, the northern courtyard will offer spill-out space for PBSA, a public access route to the rehearsal building and suitable access to the service areas. The surfacing will be suitable for HGVs where it is required to allow for access. New planting will be incorporated - where it is not conflicting with vehicle tracking-, in the form of a green wall against the existing listed retaining wall and transitional green paving.

South Courtyard

The Southern courtyard is a mixed-use area, providing a spill-out spaces for PBSA and a zone suitable for HGV overrun required to service the buildings. To create a soft transition throughout the courtyard, new planting will be added along with a green wall in front of the existing listed retaining wall and transitional green paving.

Stepped Landscape

North Steps

The northern steps provide a direct link and primary route between levels for the Scottish Opera site and any future developments to the North. Elements of soft

landscape, trees, extended platforms and seating nooks are integrated into the terraced landscape, providing shelter, visual impact and spaces to gather and rest.

South Steps

The south steps offer a series of spaces and pockets throughout the terraced landscape, providing access from the platform level to the upper levels of the site. Creating a green landscape, both trees and considered planting will be incorporated into the terraces, taking full advantage of the full sun exposure throughout the day. The steps will connect to the PBSA entrance zone via a smaller set of steps.

PBSA plazas

The PBSA plazas located at the top of both the northern and southern steps, provide a connection to the site and the adjacent canal and towpath. Plaza on the south side offers spill-out seating space to the cafe, whilst plaza on the north side has a section of a planted sedum roof.

Canal Landscape

At present the canal landscape offers an existing towpath, trees and soft landscaping. This proposal looks to enhance the landscape and create a connection between the canal and the new development.

The addition of street furniture, such as cycle stands and seating would encourage users to experience the landscape as opposed to just passing by.

Adding access points from the site to the canal and towpath allows for stronger connections and usage of the canal towpath and the various national cycle network connections the canal offers. Creating adjacent plazas to the towpath also offers opportunities for temporary events, markets and gathering spaces.

Walled Garden

The walled garden is a hidden gem in an urban setting. A space to be discovered, and to be enjoyed by all. The garden comprises a few key zones, including spaces to rest, play, discover, and connect with nature. Terraced planted with integrated seating provide ample rest spots to take in the views of the surrounding city. Highlighted with bespoke feature paving, two key areas within the garden offer the opportunity for event spaces and spill-out areas. The southern steps down from the walled garden act as an outdoor theatre, providing seating for future events and shows.

PBSA Roof Terraces

The roof terraces will provide a shared green space for PBSA users. Offering space for play with featured ball game areas, rest and gathering. The space will provide additional soft landscaping with the introduction of raised planters and considered planting, softening the rooftop landscape. Integrated seating areas will be provided to offer additional gathering, meeting and resting points across the terraces. The spaces will be mirrored across the two PBSA buildings to allow maximum greening of the rooftop sites.

The conceptual and deliverable components of the public spaces and amenity are outlined in full within the landscaping sections of the Design & Access Statement.

The proposed development complies with the requirements of CDP1 and SG1.

Policy CDP 2 ‘Sustainable Spatial Strategy’ and CDP 5 ‘Resource Management’ can be assessed together.

Policy CDP 2 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.

Policy CDP 5 states that Glasgow is taking a strategic approach to energy planning, seeking to reduce energy consumption and utilise cleaner and more renewable sources of energy. GCC 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. The detailed SG associated with this is SG 5 ‘Resource Management’.

An overarching Energy Statement has been submitted with this application and outlines that the proposed development supports the aims and principles of Policy CDP 2 and CDP5 and the manner in which sustainability principles have been incorporated into the development proposals. This is expanded upon further regards NPF4 Policy 1 and 2 above, as well as matters related to transport, flooding, investment, accessibility and community benefits.

In summary, the following measures are being proposed:

- Protects and promotes the city centre’s diverse functions i.e. with regards to promoting city centre living, with mixed use environments, adding to its mix and vitality.
- Densification is to be welcomed and will support Glasgow’s economy.
- The site constitutes brownfield land, meaning that the proposed development will reduce the pressure to develop elsewhere on greenfield land.
- Is within an Economic Development Area and residential location that allows for a mix of uses in principle.
- The site is not predicted to be at risk from flooding from groundwater or infrastructure.
- Gold Standard – Compliance with Glasgow City Council CDP5 that sets the standard for carbon reduction.
- High Quality Landmark Building – The scheme shall be of a high quality design and construction. As the Applicant and developer, they shall ensure the building is delivered to a high standard.
- Reduction in Embodied Carbon.
- Net Biodiversity Value Increase – Significant enhanced amenity planting and landscaping and roof design.
- Promotion of active travel with a car free and cycle friendly development.
- Within a highly accessible location to all forms of transport.

The proposals are in line with the overarching principles of sustainable development and accords with Policy CDP 2 and CDP 5.

The application site is located within an Economic Development Area and Policy **CDP 3 'Economic Development'** applies.

This policy seeks to support Glasgow's economy by directing development to appropriate locations and identifying where in the City economic development will be encouraged. A key priority of the CDP is to maintain the City as an investment location and vibrant place in which to live and work.

The Port Dundas and Garscube Economic Development Area, in which the application site is located, is adjacent to a Transformation Regeneration Areas that will be subject to other targeted area-wide policies. While it is recognised that these areas also contribute positively to the City's economy, it is considered under Policy CDP 3 that the application site could better meet and promote city-wide strategic economic goals. Furthermore, it is considered that the Economic Development Areas such as the application site will benefit from the wider transformational projects currently being developed and implemented close to it.

The proposed development is not considered to be at odds with this policy and takes considerable encouragement from it, especially in the context of providing a new Scottish Opera Headquarters and significant economic benefits that will arise, alongside a PBSA housing mix that is very much in need in the city. Indeed, the proposed development by its very essence is transformational on a National and cultural scale rather than local.

CDP 7 'Natural Environment' notes that development should not result in a loss of biodiversity or habitat connectivity, and that where possible, there shall be an enhancement.

The PEA concludes that there is no evidence for nearby protected sites which could be adversely impacted or potentially constrain this development, nor of any protected species being within the Site.

With the exception of mitigation for birds potentially breeding within trees and shrubs which could be disturbed during breeding attempts, and a precautionary otter protection plan, no further mitigation is necessary. These requirements can be secured through appropriately worded planning conditions.

In terms of biodiversity enhancements, the proposed development is informed by an understanding of the existing characteristics of the site and its local ecological context.

The proposal will retain most of the existing trees that are of Category B 'Good' as identified in the Arboricultural Survey and look to integrate nature-based solutions where possible. This will include future management of the natural assets to ensure that the objectives are met.

The new tree and planting strategies are in line with recommendations highlighted in PEA, Arboricultural Surveys and NPF4 and are aimed on significant biodiversity enhancements and nature networks, linking to and strengthening habitat connectivity within and beyond the development. The project is aiming to add new trees which are native to Scotland and UK environment and will provide homes for wildlife across the year. The ornamental planting will consist of mix of native shrubs, grasses and perennials, attracting pollinators and other insects to the site.

As recommended in the Draft NFP4 Statement section of the PEA report, the project will make biodiversity enhancements. We see this development as an opportunity to make a positive contribution to address national biodiversity, habitat and climate

change issues, and the above are all outlined in detail within the Design & Access Statement. These include, but not limited to:

Tree and Shrub Planting

There are a number of interventions in the proposal which will create new and change existing habitats as the project progresses. These changes will be carried out sensitively so that there is minimum disruption to nesting or hibernating animals and in line with current guidelines and legislation. With the addition of nest and roost boxes in new structures and the proactive management of the new planting areas there will over time be an increase in the diversity of species across the site. The long-term programme of surveying will inform the active management of the site, guiding resources to where they are needed most, and highlighting success stories.

Diversity of Species

There will be limited opportunity for new planting areas across the new development, therefore where it does exist the planting palette will be considered to work hard to provide a diversity of species giving seasonal variation and habitat for bees, butterflies and other LBAP promoted species. In addition, we will strive to maximise the extent of any retained vegetation, shrubs and trees, to provide as many age and species diverse, and rich habitats across the site as possible.

Hibernacula, Refugia Bat Boxes and Bird Boxes

The proposal will include for specific nesting, roosting and hibernating sites across the area. Ideally these would be constructed with the help of local wildlife groups, ecologists and schools. These could include specific nest boxes for sparrows, swifts, and also integrated bat boxes and bee bricks that can be built into suitable structures. Bug hotels and hibernacula can be constructed with local youth groups to encourage awareness and excitement in the nature.

Nesting Birds

The proposal will add new nest boxes and improve the food sources through increasing insect habitats.

Bats

There are many opportunities to add roost sites to the existing perimeter trees and structures along with standalone bat rocket boxes. This will increase the opportunity for bats to thrive here especially when coupled with an increase in insect's habitat.

Butterfly

The existing vegetation contains several food plants for a variety of species of butterflies. The proposed planting will encourage butterfly species by providing greater diversity of food plants, and a connected habitat to the canal towpath and embankments.

Bees

There are 200 species of bee in Britain, 14 are described by Nature Scotland, in detail for identification in Scotland. There are many different habitats that this diversity requires to thrive from stonewalls to open grassland and woodland. This site has the

potential to attract and cater for many of them. The south/west facing slopes to the canal are of particular benefit and attraction to bees.

Trees

In terms of trees, the general consideration is to ensure that the perimeter trees to the east boundary are integrated where possible with the development and that any building edges, boundary fences or railings are considerate of the tree Root Protection Areas. In the likely event of tree felling the development will ensure that there is an equivalent level of tree planting proposed across the site.

The project is proposing circa 60 new trees to be added on multiple levels offering more diversity to species and working with spatial design considerations for creating better and more usable external environment.

The orientation of the site combined with existing and proposed locations for the building creates unique environmental conditions where some areas of the site will have sun exposure throughout most of the day whilst others will be overshadowed for long periods of time. Therefore, this was an important aspect when considering the selections of tree species for each of the public areas.

The two plazas at the corners of Edington Street will be created as a result of the reducing the size of service yards and making these intersection points open to the public. There are a few trees that will need to be lost due to necessity to adjust site levels and make areas more accessible and inclusive. To compensate this, the project will add 6 new Semi-Mature trees that will enhance local biodiversity and create better overall environment for people and wildlife.

The areas in the service yards that will need to be made clear of any trees vegetation to improve usability of the space, as they are currently planted in slopping soft landscape. The proposal is to add a row of 11 Semi Mature evergreen trees along the retaining wall between Level 0 and Level 1 to soften visual appearance of the wall and create an immediate improvement to wind tunnels created between the buildings. We also propose to add 12 new trees to the perimeter of service yards on L0 & L1, to break up the hardstanding of the areas. These trees will be located in the areas that will not be affected by tracking.

The proposed landscape stairs to south and north of the site will be integrated with standard and multistem trees scattered within planting beds. Although some groups existing trees will be lost, the new trees will add better value to overall biodiversity of the site.

Where new PBSA bridges are proposed, the landscape will include new tree planting to continue existing line of trees along the canal to maintain green corridor for visual and biodiversity impact. The proposed species will add a pop of colour to the canal promenade, marking the entrance to the new development.

All suggested species have been carefully considered to reflect existing trees selection and goals for improved biodiversity. The proposed species list is presented on the page to the right

The proposed development is fully in accordance with CDP 7 and demonstrates tangible biodiversity and landscape betterment, and standard planning conditions can be imposed as necessary.

CDP 8 'Water Environment' requires applicants to demonstrate that proposals will contribute to minimising and reducing flood risk and make satisfactory provision for SUDS that should be designed to deliver enhancements for biodiversity and people. There is a strong presumption against development likely to have an adverse effect on the water environment.

The Applicant has submitted a detailed Drainage Report and Flood Risk Assessment and this has been assessed against NPF4 Policy 22 above. This provides GCC the necessary comfort and compliance with Policy CDP 8.

CDP 9 'Historic Environment' seeks to protect, preserve, and where appropriate, conserve / enhance the historic environment. It also states that GCC will not support development that will have an adverse impact upon the historic environment, unless SG criteria are fully satisfied.

It is critical to note that the application site is not located within a Conservation Area and does not contain any listed building(s). There are listed buildings within proximity of the application site and as noted within the Design & Access Statement, the design evolution has sought to respond to townscape and environmental matters.

In stating this, as noted within the assessment of NPF4 Policy 7 above, the Applicant has appointed Harrison Stevens to undertake a TVIA. This assessment looks at the likely (built) heritage and also related townscape/visual impact associated with the proposed development including the visual effects of change arising from the introduction of new building of scale in this location.

The TVIA considers that the proposed development has been developed with regard to the surrounding townscape and visual context of the application site, and that whilst significant effects will arise, the introduction of the development is sensitive to key features of the existing built form and the sites immediate setting. The careful approach to the design of the proposed development will assist in reducing adverse effects and will introduce beneficial and positive changes to enhance the immediate area. The influence of additional development is appropriate to the wider townscape setting.

The proposed development is a positive intervention into the townscape and will enhance the area.

Matters related to materials, elevation treatment, scale and mass, this is documented within the Design & Access Statement and summarised under NPF4 Policy 14 above.

With this sensitive massing and scale, and positive design that is considered to be a positive addition to the area. The proposed development is considered to consistent with the aims of CDP 9.

CDP 10 'Meeting Housing Needs' advises that the focus of the GCC approach is on ensuring that good quality places are created, with a mix of accommodation to suit different household types, and at densities that are appropriate to the surrounding area. Policy CDP 10 is supplemented by **SG10 'Student Accommodation'**. This SG seeks to ensure the provision of high quality student accommodation in appropriate locations whilst protecting the character and amenity of existing areas. It applies to all types of student accommodation developments.

The overarching aims of the SG are that GCC expects PBSA to provide students with high quality accommodation which provides on-site amenity spaces and communal facilities, accommodation that benefits its surroundings, and appropriately located can

make a positive contribution to the local environment. Critically this includes supporting regeneration objectives through the renewal of vacant and derelict sites, such as that proposed, and boosting local populations to sustain facilities and amenities.

Within SG10, the relationship between place and capacity for student accommodation is considered against the following factors: density of residential population, cumulative effect upon mainstream and student accommodation, range of local facilities/mix of uses within the locality and proposed non-student accommodation facilities.

There is an appreciation in SG10 that there is no single threshold or methodology to establish whether a concentration of student accommodation is too high and will be harmful to maintaining a sustainable community. However, an area that has a high density residential population with a broad range of supporting uses, facilities and services is likely to generate a stronger relationship between community with place as there are far more opportunities for social interaction and common points of interest to help define a shared community relationship.

The proposed development is compliant as it is not within an area of PBSA over-concentration. This is evidenced within the Savills student demand assessment report. There is a significantly lower concentration of PBSA, either in terms of the number of schemes or the overall number of units, than can be seen in other areas of Glasgow, especially in areas close to the bigger universities. The proposed development shall be absorbed into the community without undermining its relationship with place and not have a harmful impact upon creating a sustainable community.

Indeed, the proposed development is in close proximity of a wide range of facilities and will provide much needed footfall and local expenditure, including specific areas of regeneration that requires day and night economy and a boost to the economy.

This is one of the critical reasons why the proposed development has included ground floor commercial uses, with the community able to access these offers.

PBSA development will also assist in vacating mainstream residential accommodation from HMO status and the creation of a more diverse population, including family accommodation.

SG 10 requires PBSA applications to be in locations with good access to University and college facilities. All of Glasgow's main university campuses are accessible within 15 minutes cycling or 30 minutes using public transport. This includes the city-centre universities which cater to around 41,200 students and the main University of Glasgow campus to the north-west. It is also less than 20 minutes by bus or subway to Glasgow Central station.

The University of Glasgow also has a campus at Garscube, 5 miles north-west of its main campus. This is also accessible from the site within 40 minutes by public transport or 25 minutes cycling.

The application site is outwith South Partick/Yorkhill and Townhead/Cowcaddens, where further proposals for purpose built student accommodation would likely undermine residential amenity. The principle of student accommodation development remains acceptable subject to other criteria being fulfilled.

In terms of utilising a whole life approach, we can confirm that the proposed development is adaptable for future uses with flexible floorplates and structure that is compatible for mainstream or other sui generis flatted residential layout. There is no impediment to conversion.

In terms of specific SG 10 'space standards' for accommodation, these have been adhered to in full within the unit types which includes a genuine mix of 470 studios and 230 ensuite cluster units.

SG 10 states that "*amenity standards for flatted dwellings, as set out in SG 6: Green Belt and Green Network, will be applied to student accommodation developments.*"

For student accommodation, amenity space may be provided as a combination of internal and external amenity spaces and this requirement and innovative forms of amenity has been met in full onsite and meets minimum amenity spaces standards that are 5sqm per bed space. Indeed, the proposed development provides 5.65sqm of amenity per bed space and exceeds policy requirement.

In terms of mixed tenure policy, it is again important to note that within the City Centre Strategic Development Framework 2021, and Cowcaddens District Regeneration Framework December 2022, the application site is located partly within the 'City Centre' boundary. This is an important context for the site and how it should be assessed in line with SG10 planning policy, and key material documents.

Indeed, through detailed pre-application discussions with GCC it has been agreed that material weight can be attached to this policy position when assessing SG 10 and its mixed tenure detailed guidance, and that the proposed development is both mixed tenure policy compliant and in the spirit of the policy.

With this, it is critical to note that the two PBSA proposed development blocks collectively has a footprint below 2,000sqm and SG 10 policy requirement for mixed tenure is not applicable.

However, even if we observe the policy matter as being out of the city centre and on the basis of the site greater than 0.3ha and 40% floorspace requirements, significant weight must be placed on the fact that what is being proposed is a genuinely mixed use offer.

With a new Scottish Opera Headquarters, significant publicly accessible open space that is curated with a purpose, commercial ground floor uses, sitting alongside the PBSA offer, what is before GCC is a genuinely unique development where a significant percentage of floorspace, circa 30%, is mixed and in compliance with the spirit of the policy intentions of SG 10 to avoid sterile single tenure developments.

There will be a mixed community offer, that will have no detrimental amenity impacts upon the local population, and indeed, will promote inclusive population growth and build sustainable communities with a place to work, live, interact, and an element of economic growth. It can be evidenced that the development design is such that there will be no conflict or harm to amenity between the different uses.

Given this context and the scope to deliver a meaningful quantum of student beds, it is considered the requirement to deliver mixed tenure and uses, as proposed, is appropriate. In particular, when assessed as a site that sits partly within the City Centre boundary in key GCC policy documents.

In addition, the Applicant has prepared an Operational Management Plan. This sets out the key principles by which the proposed student accommodation will be managed in order to ensure all residents, staff and visitors have the highest quality experience, alongside protecting the interests of the wider community and local environment. The proposed development will be operated and managed by an experienced Student

Operator. Prior to completion of the development, if not during the planning consenting process given talks are at an advanced stage, an Operator will be appointed.

This Operational Plan covers the following key areas: staffing / reception services; response to incidents; site security; cleaning and refuse; arrival management; restriction on use of motor vehicles; bikes; and post and deliveries and addresses Policy SG 10 requirement on management and security criteria.

The proposed development is considered to comply with the aims of Policy CDP 10 and SG10, including its intentions to create genuine mixed use environments that are public centric.

CDP 11 ‘Sustainable Transport’ aims to ensure that Glasgow is a connected City, characterised by sustainable and active travel. The policy states that new development will be directed to locations served by existing public transport services and active travel routes. It also seeks to discourage non-essential car journeys and reduce pollution and other negative effects associated with vehicular travel.

CDP 11 supports the development of car-free housing on suitable sites within the City Centre and the site criteria contained within SG 11 can be met with the proposed development. These are outlined within the Transport Assessment. It is intended that the development will essentially be car free with no allocated car parking for PBSA residents.

To ensure this is controlled, the tenant handbook will explicitly specify that the location is car free and that students are not to bring their own cars to the accommodation. The operator will proactively monitor this restriction, and should any tenant not follow this restriction or complaints are received about a vehicle associated with a resident, they will be treated as having a serious breach of the tenancy agreement.

The proposed development will operate in compliance with a site-specific Travel Plan completed by which includes a range of measures to encourage use of public transport, walking and cycling.

The proposed development can be appropriately serviced and further details on this, and all other transport matters has been assessed under NPF4 Policy 13.

The proposed development is in compliance with the aims of Policy CDP 11.

CDP 12 and IPG 12 ‘Delivering Development’ aims to ensure that development contributes to a sustainable, economically successful City, through the provision of reasonable infrastructure and facilities that are necessary to mitigate the impact of change on Glasgow’s resources, and that are appropriate to both the nature of the development and its location.

As part of this policy and its associated SG, GCC requires developers to undertake an assessment of the proposal site and its surroundings to determine the need for, and the proposed response to, the requirements specified. The most relevant of which is amenity space provision which equates to 5sqm amenity per bed space or circa 0.55ha of amenity per 1000 population.

As outlined within the Design & Access Statement, the proposed development provides extensive communal and amenity spaces using a combination of external and internal shared areas, including rooftop space. This amenity space has been documented within this Planning Statement and equates to 5.65sqm of amenity per bed space and a

total of 3,952sqm across the proposed development for 700 units. 1,670sqm of this amenity space is internal, and 2,283sqm is external.

Section 12.7 of the Design and Access Statement provides a detailed analysis of this amenity breakdown. This includes details on the range of internal amenity for residents extending their living space throughout the building. Internal amenity space shall range from café, social learning space, gym, resident's lounges and games rooms to dining and party rooms generating a vibrant sense of community within the building. The curation of the external plaza with its seating areas and an area to meet, to the roof terraces with its panoramic views of the city as well as benefitting from morning and evening sun. Raised planters and seating areas provide a unique place for gatherings.

The overall quality and quantity of amenity / open space is provided with a purpose in mind.

However, in addition significant community accessible open space is proposed and this has been outlined in detailed with the Design and Access Statement and NPF4 Policy 3 and 4, and CDP Policy 1 above.

With the quantum and quality provided, no developer contribution is necessary for either the PBSA or Scottish Opera developments.

The proposed development has met the requirements of Policy CDP12 and is in compliance

DEVELOPMENT PLAN CONCLUSIONS

The proposed development can draw significant support from the up to date Development Plan, including policies set out in NPF4 and CDP.

Section 25 and 37(2) of the Town and Country Planning (Scotland) Act 1997 require that planning decisions be made in accordance with the Development Plan unless material considerations indicate otherwise. The above assessment has concluded that the proposed development is in accordance with the extant Development Plan and as such planning permission should be granted.

6. MATERIAL CONSIDERATIONS

The following material considerations are relevant to the assessment of the proposed development.

- Cowcaddens Strategic Development Framework
- Glasgow City Centre Strategic Development Framework
- Glasgow City Centre Living Strategy
- Economic Benefits

Cowcaddens Strategic Development Framework

The City Centre Strategy and Action Plan 2014-19 set out a vision and objectives for central Glasgow and defined nine city centre Districts, each of which has or will have a District Regeneration Framework (“DRF”) prepared.

A DRF is a 10-year regeneration plan with short, medium, and long-term actions to be delivered that will guide physical, social, and economic regeneration. The DRF’s are intended to become the Local Development Frameworks as defined in the CDP.

The DRFs are created with input from local communities, organisations, and a wide range of stakeholders, both internal and external.

The application site falls within the Cowcaddens district.

Cowcaddens becomes the gateway to/from the north; linking the city to the Canal and enlivened by creativity and cultural clusters. Cowcaddens Cross becomes the focal point in a series of open spaces linking to the West End. The area is enlivened as a productive urban zone of innovation, last mile logistics and the new circular economy.

Aspirations of the Cowcaddens DRF include upgrading the urban networks, to intensify housing offers, optimising space for nature, and creating a clear programmatic zoning and activation by mixed use, and critically, filling in the gaps with a diversity of housing typologies and lively neighbourhoods.

Regards the Port Dundas / Speirs Wharf area in particular, the DRF states that neighbourhoods that suffer ongoing disruption or severance from the city centre due to proximity to the M8, traffic dominated streets or the presence of vacant land and derelict land, present an opportunity for urban repair and renewal. The application site and its surrounding environment is specifically mentioned as an area of opportunity.

The application site, and Canal Quarter in general, is also noted in the DRF as an underutilised location with great potential, including as a cultural destination; cafes/ bars/ restaurants and where an improved wayfinding strategy would aid its development. This includes restoring routes from the ‘Canal to Cathedral’ that connects Spiers Wharf to GCU campus and on to Glasgow Royal Infirmary / Glasgow Cathedral. The proposed development and its significant regeneration benefits as a new cultural destination, with improved permeability, routes, and access to the Canal and its facilities contributes positively to this GCC ambition in full.

In terms of city centre living, the DRF states that *“Cowcaddens can make a major contribution to attracting and retaining residents to the area. This would positively impact the regeneration of the District and bolster future change.”*

In addition, the DRF will promote / market sites / vacant buildings for housing.

As a brownfield and vacant site, the proposal to invest and create an improved arts quarter and residential offer by the Applicant can take significant support from the DRF.

City Centre District Regeneration Framework

In May 2021 GCC approved the SDF for Glasgow city centre and it is now adopted as SG for Glasgow's CDP.

As noted, the application site sits partly within and on the boundary of the SDF and it is therefore beneficial to consider its ambitions

The SDF sits alongside the City Centre Strategy and contains an action plan for future studies, strategies, masterplans, and projects to progress delivery of the vision and take forward the transformation of the centre.

The SDF guides the development of the city centre over the next 30 years and sets out the following vision statement:

“In 2050, the city centre will be a vibrant, inclusive, sustainable and liveable place. A green, attractive and walkable city centre will create a people –centred place that is climate resilient, fosters creativity and opportunity and promotes social cohesion, health and wellbeing and economic prosperity.”

To achieve this vision, the SDF identifies six ambitions to make the city centre more vibrant, liveable, connected, green and resilient:

- *“Reinforce the centre's economic competitiveness;*
- *Re-populate the centre and ensure liveable and sustainable neighbourhoods that promote health, wellbeing and social cohesion;*
- *Reconnect the centre with surrounding communities and its riverside;*
- *Reduce traffic dominance and car dependency 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*
- *Repair, restore and enhance the urban fabric to reconnect streets and reinforce the city's distinctive heritage and character.”*

The proposed development directly contributes towards meeting these 6 aims as follows:

- The proposals involve significant investment at a strategically important brownfield site in what is identified as City Centre, which reinforces the Centre's competitiveness as a regional and national city in which to regenerate and invest.
- Development frameworks incorporate residential development offer which will assist in repopulating the City. The proposals are of a high-quality vibrant

design, with ample and useable landscaping and amenity space which will promote healthy living, well-being, and liveability.

- The proposed development seeks to connect the site with the wider city centre.
- The proposals involve a 'car-free' community which promotes sustainable transport methods, permeability for pedestrians and makes the most of the site's excellent city centre location with easy access to public transport.
- Green the centre and make it climate resilient with high-quality amenity spaces and green-blue infrastructure that caters for a variety of human and climatic needs.
- The proposed development utilises an existing brownfield site and works to reconnect the urban fabric of the locale. The proposal takes account of key historic views in the locale and ensure these are maintained through the site to reinforce the Glasgow's distinctive heritage and character;
- The SDF promotes densification to meet the challenges ahead and we fully support this. High density will contribute to the wider intensification of the city centre, provide critical mass that will contribute to the townscape, and stimulate the local economy. The application site is suitable for such density and positive townscape contributions.

The proposed development in all its forms draws significant support from the City Centre SDF.

City Centre Living Strategy

Again, given the designation of the site as partly within the City Centre boundary, it is prudent to note that support for the development of student accommodation is outlined in Glasgow's city centre living strategy 'Glasgow Vision 2035' which seeks to double the city centre population to 40,000.

It states that student accommodation will be a key part of the housing mix to meet this ambitious target and enable a sustainable and inclusive and diverse city centre.

It recognises that new student schemes and proposed developments offer increased footfall that can attract more residential uses into an area. Including:

'Despite the often negative perceptions of students, there are many positive factors allied to this group, including their substantial contribution to the local economy'.

It is recognised that Glasgow outperforms most of its comparator cities for student retention after graduation, so it is critical that the experience of living in Glasgow is positive for students and communities. The city centre living strategy aims to widen the demographic profile of the city centre, ideally attracting families as well as continuing to attract students, young professionals and downsizers.

As part of City Vision Report the consultation process concluded that *'student accommodation is a key factor in the student's decision-making process and it presents significant economic opportunity and impact, with positive and negative social impacts which require further investigation'.*

The proposed development appreciates that city centres with a primarily commercial focus can often lack vibrancy and any steps to improve footfall, the environment and

experience of the day and night economy is to be welcomed. The PBSA proposal in particular fully supports the above overarching ambitions to grow the population and in creating communities as well as places.

The proposed development will enable and encourage higher density residential living development, as advocated within the Living Strategy document. This includes taller buildings where it can be demonstrated that its height will not impact upon key views or heritage receptors. High density development will contribute to the wider intensification of the city centre, provide a critical mass that will contribute to the townscape, and stimulate the local economy.

The application site is perfectly placed and located to accommodate high density tall buildings sensitively and strategically from a townscape perspective.

Taken as a whole, the proposed development can take considerable weight from the proposals within the Glasgow City Centre Living Strategy Glasgow Vision document.

Economic and Social Value Benefits

EKOS has been appointed by the Applicant to prepare a Social Economic Impact Assessment of the proposed development.

The economic impact assessment has focused on the economic and wider benefits of the proposed development, including direct on-site employment, and associated Gross Value Added (“GVA”) impacts, alongside the indirect impacts arising from supply and expenditure within the local economy. The project will help to sustain employment within the City Centre through supporting student expenditure in the local economy.

An overview of the potential for the proposals to generate social value is also presented. This has had reference to established frameworks for measuring social value, providing a consistent methodology and best practice templates for embedding social value into capital projects

A summary of the outcomes is noted under NPF4 Policy 25 above.

Significant weight should also be placed upon the benefits of Scottish Opera itself.

As noted above, the cultural sector plays a central role in Glasgow’s civic and economic narrative. It was culture that drove the city’s post-industrial reinvention, and it continues to be a critical part of Glasgow’s reputation as a modern, vibrant and outward looking city. Scottish Opera is the largest, and its importance both to the cultural ecology of the city and to Glasgow and Scotland.

Scottish Opera is an exemplar which entertains, inspires, surprises, educates, challenges and delights audiences old and new by delivering high quality opera throughout Scotland, the rest of the UK, and internationally. It creates employment and the company plays an important role in the international opera landscape, garnering Scotland worldwide recognition for high-end creativity.

The company’s education and outreach programmes are praised for their reach and impact and demonstrate the wider social impact of the company beyond its main performance programme. In a single year, the education programme engaged almost 40,000 people across Scotland, and the proposed development will provide new facilities for education work in Glasgow to expand upon the already excellent work it undertakes.

The Applicant is committed to a positive social value impact and believe in making a positive contribution to society through delivering high-quality buildings, strengthening communities, enriching people, and enhancing the natural environment. Building strong relationships with local people is central to our success, and they strengthen this by being active members of the community, as well as on a City and National level.

Material weight can be attached to the social and economic benefits that will arise from the proposed development and the socio economic impact assessment should be read in full.

Conclusions

This Chapter has provided a summary of the relevant material considerations applicable to the consideration of the proposed development. The proposal can draw significant support from the various material considerations outlined above and as such adds weight to the granting of planning permission.

7. CONCLUSIONS

Under the provisions of The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, the proposed development can draw significant support from the relevant policies in the statutory Development Plan. The proposed development complies with its underlying aims, including NPF4.

A range of detailed supporting studies have also been submitted alongside the application for planning permission. These technical studies are submitted to assist the project team, Planning Authority and Consultees determine the appropriateness of the site for the development proposed.

The following conclusions have been determined.

Principle of Use and Design Considerations

The approach to the design of the proposed development has involved an extensive and iterative process with input from GCC, the community, and wider stakeholders.

The Applicant has undertaken a comprehensive market and cost appraisal to ensure that the final proposal is presented as a suitable interpretation of the opportunity to deliver a vibrant and viable mixed land use that can regenerate this long standing development site and the ambition for a state of the art and community centred Scottish Opera Headquarters.

Alongside this, PBSA development provides a complementary use with no adverse impacts are anticipated on amenity, biodiversity, the existing transport network, or heritage assets. The site is brownfield and vacant, and the proposal has an appropriate layout and density with high-quality design which provides ample amenity space and opportunities for residents' interaction.

A key factor for the Applicant has been to ensure that the final proposal can be delivered. There has also been a considered approach taken towards townscape and cultural heritage considerations, especially regards building height and massing at the right locations on the application site.

The proposed development also has positive attributes in terms of sustainability and biodiversity, and is considered to be a compatible, and indeed, significant betterment.

Planning Policy & Material Considerations

The proposed development is in accordance with and can draw significant support from the relevant policies in the statutory Development Plan, namely CDP and NPF4. The proposed development also complies with its key underlying aims.

In addition to the support from the Development Plan, there are a number of important material considerations which deserve significant weight in the determination of the proposals.

It will realise the redevelopment and regeneration of a site that has lain vacant for a significant period of time with investment, tangible cultural and economic benefits, employment opportunities, and a sympathetic PBSA use that is viable, deliverable and in demand in Glasgow.

This will also act as a catalyst for other proposals and assist GCC in meeting their aspirations for the Spiers Wharf areas to be a cultural focus with better access to the Canal, and of doubling the residential population by 2035, in particular in challenging areas of the City that require investment and additional footfall and expenditure.

Overall Conclusions

Overall conclusions can be summarised as follows, the proposals:

- Will provide Scottish Opera with a new state of the art headquarters that will have a national presence and powerhouse.
- Provide significant and tangible community benefits such as the improved Scottish Opera offer with its outreach and community programmes, commercial uses, significant public realm and open spaces, and improved access to the Canal.
- Will meet an identifiable need for more PBSA in Glasgow.
- Are compliant with NPF4 and CDP policies.
- Seek to introduce successful brownfield development which would vastly improve the fabric of the locale.
- Have been developed in consultation with PBSA sector to ensure it meets the needs of students, in particular the post Covid experience of health, well-being, and pastoral care.
- Will deliver a high-quality design solution.
- Useable, interactive, and positive amenity spaces are an integral design component of the proposed development.
- Have sustainability at the heart of the proposed approach, in terms of the location and accessibility characteristics, in line with the principles of NPF4 and CDP Policy / SG 5.
- Will allow the development of a site identified by GCC within the District Regeneration Frameworks as an area of fragmented landscape in need of repair and an area of opportunity. The proposed development is a catalyst for positive change.
- Bring vitality and viability to this part of the City.
- Will re-densify the City and provide much needed footfall and revenue.

This Planning Statement presents a strong and persuasive case for detailed planning permission to be granted for the proposed development and a positive determination is encouraged.

EDINBURGH

7 Exchange Crescent
Conference Square
EH3 8AN
0131 225 6612

GLASGOW

Onyx, 215 Bothwell Street
G2 7EZ
0141 204 3838

ABERDEEN

25 Albyn Place
AB10 1YL
01224 588866

LEEDS

3rd Floor Carlton Tower
34 St Pauls Street
LS1 2QB
0113 243 6777

LONDON

4th Floor Langham House
302-308 Regent Street
W1B 3AT
020 7436 1212

MANCHESTER

2nd Floor
28 King Street
M2 6AY
0161 249 9778