

ADDRESS:	120 Woodville Street Glasgow
PROPOSAL:	Use of land for siting of shipping containers and erection of boundary fence and gate
DATE OF ADVERT:	16 February 2024
NO OF REPRESENTATIONS AND SUMMARY OF ISSUES RAISED	Seven representations submitted including from Councillor Dan Hutchison all objecting to the proposal. Summarised as follows: • Additional traffic and disruption to already overburdened area. (Local businesses; subway users, football stadium events); • Noise and visual issues it will create for residential amenity; • Whilst a mixed area, the proposal is in immediate vicinity of residential properties; • Potential impact on subway; • loss of trees and shrubs bounding site; • Locale requires positive regeneration; and • Removal of a community greenspace. Non material objections: • The pavement area on Clynder street is already dangerous to walk on. • Greater damage to the already pothole laden roads in the area.
PARTIES CONSULTED AND RESPONSES	Strathclyde Passenger Transport (SPT): SPT initially objected as the development proposal was located above Subway tunnels between Ibrox and Govan stations. Concern was expressed about the potential impact on the integrity of the Subway infrastructure and operations as insufficient information was available to ascertain this. However, following discussions with the agent, SPT confirmed that the objection was withdrawn. An Asset Protection Agreement was signed and engineering acceptance agreed, subject to the following conditions: 1. No breaking work will be undertaken to the existing land, only slight works to accommodate a further layer of Type 1 which will be compacted and laid on top of the existing ground. 2. The depth of the Type 1 will be approximately 150-175mm. 3. The total number of storage containers are 45 single storey, not doubled up. 4. Each container will have a net weight of approximately 2000kg. 5. Whilst the site is in operation only 1 car/van will be allowed to enter and stay on site whilst loading and loading their stock. A request was made by SPT to include these conditions if consent was granted.
PRE-APPLICATION COMMENTS	The applicant and agent did not seek pre-application advice or discussions with Glasgow City Council prior to submission of this application. Therefore, the case officer was unable to provide advice on whether the proposed development complied with the relevant Policy and Guidance of NPF 4 and the City Development Plan. The Council has formalised the means for obtaining pre-application advice of this type in order to make this stage of the Planning process more accessible and efficient for applicants, agents and Planning staff. The Council welcomes pre-application discussions between the applicant, their agent(s) and its planning staff in advance of making an application for any scale of development. As stated above, the agent and applicant failed to avail themselves of this service.

EIA - MAIN ISSUES	NONE
CONSERVATION (NATURAL HABITATS ETC) REGS 1994 – MAIN ISSUES	NOT APPLICABLE
DESIGN OR DESIGN/ACCESS STATEMENT – MAIN ISSUES	NOT APPLICABLE
IMPACT/POTENTIAL IMPACT STATEMENTS – MAIN ISSUES	NOT APPLICABLE
S75 AGREEMENT SUMMARY	NOT APPLICABLE
DETAILS OF DIRECTION UNDER REGS 30/31/32	NOT APPLICABLE
NPF4 POLICIES	<u>NPF 4 Policies</u> Policy 1. Tackling the climate and nature crises Policy 2. Climate mitigation and adaptation Policy 3. Biodiversity Policy 6. Forestry, woodland and trees Policy 9: Brownfield, vacant and derelict land and empty buildings Policy 13. Sustainable transport Policy 14. Design, quality and place Policy 20. Blue and green infrastructure Policy 22. Flood risk and water management
CITY DEVELOPMENT PLAN POLICIES	<u>City Development Plan Policies</u> CDP 1 & SG 1 – Placemaking CDP 2 – Sustainable Spatial Strategy CDP 6 & IPG 6 – Green Belt & Green Network CDP 7 & SG 7 – Natural Environment CDP 8 & SG 8 – Water Environment CDP 11 & SG 11 – Sustainable Transport
OTHER MATERIAL CONSIDERATIONS	
REASON FOR DECISION	V02 - Reason to Refuse - does not meet DP The proposal was not considered to be in accordance with the Development Plan and there were no material considerations which outweighed the proposal's variance with the Development Plan.

Comments	
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Planning History	20/01959/PRE- Use of land as caravan park-closed 97/01823/DC- Environmental improvements and streetscaping including formation of hard and soft landscaping, erection of fencing and gates-GC 87/01887/DC- Amendment to planning consent and deletion of conditions-RF 86/00072/DC- Use of land as container storage area-GC
Site Visits (Dates)	Viewed using Google Streetview.
Siting	The site is a vacant site on the corner of Woodville and Clynder Street in ward 05 – Govan. The locale is mixed with industrial uses to the south and west and residential uses directly adjacent to the east (detached and terraced properties) and north (tenemental properties).

Design and Materials	The applicant seeks consent for the use of land for siting of shipping containers and erection of boundary fence and gate. The container storage is intended for use by businesses & the general public. Containers measure 6058mm×2438mm×2591mm and 45 of these are to be located within the site. The containers will be coloured black and single storey. The site ground shall be levelled and finished with type 1 hardcore & enclosed with 2.1m high palisade fencing painted black. Fencing shall run along the perimeter of the site, behind the low level facing brick wall along the pavement to Woodville Street. Access to the site shall be by a sliding 5m wide gate with the existing access (Clynder Street) widened to 5m to allow two way traffic. Containers shall positioned at the edge of the site & centrally with minimum 6m between the containers. Operating hours: 7am to 9pm. Staff will attend site at the beginning & end of the agreed hire periods with customers. The applicant has submitted a letter of support from Councillor Imran Alam which states that 'as an advocate of promoting local businesses and the advantages these create, I support this proposal'.
Daylight	No issues
Aspect	The containers are positioned throughout the site.
Privacy	No issues
Adjacent Levels	The existing site appears to be fairly level but, part of the proposal, involves levelling it. No details have been included existing and proposed site levels.
Landscaping (Including Garden Ground)	Mature trees and shrubs are predominantly present on the eastern and southern boundary and but also within the site. According to the proposed site plan, the complete removal of the existing vegetation, including trees and shrubs, will occur. Further scrutiny is provided in the section head "Comments" below.
Access and Parking	See comments under Policy 13. Sustainable transport; and SG 11- Sustainable Transport below.
Site Constraints	Coal Authority - Low Risk/NPF4 - NPF4 National Development/ Clyde Mission/Consult With SPT
Other Comments	Sections 25 and 37 of the Town and Country Planning (Scotland) Act 1997 requires that where an application is made under the Planning Acts, it shall be determined in accordance with the Development Plan unless material considerations indicate otherwise. The following assessment therefore focuses on the policies of the adopted development plan. The two main issues to consider in the assessment of this application are:- (a) whether the proposal accords with the Development Plan; and (b) whether any other material considerations have been satisfactorily addressed. In respect of (a), the Development Plan comprises National Planning Framework 4 (NPF4) and the City Development Plan (CDP). <u>NPF 4:</u> The National Planning Framework 4 (NPF4) is the national spatial strategy for Scotland up to 2045. Unlike previous national planning documents, the NPF4 is part of the statutory Development Plan and Glasgow City Council as planning authority must

assess all proposed development against its policies. The following policies are considered relevant to the application:

Policy 1. Tackling the climate and nature crises

When considering all development proposals significant weight will be given to the global climate and nature crises.

Comment:

The aim of the policy is to encourage, promote and facilitate development that addresses the global climate emergency and nature crisis. Whilst the use of an inner-city vacant site could be welcomed, the proposal includes the removal of all trees and shrubbery on site and coverage of the entire site with hard standing.

The proposal, therefore, does not accord with **Policy 1 on tackling the climate and nature crises**.

Policy 2. Climate mitigation and adaptation

a) Development proposals will be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible.

b) Development proposals will be sited and designed to adapt to current and future risks from climate change.

c) Development proposals to retrofit measures to existing developments that reduce emissions or support adaptation to climate change will be supported.

Comment:

The proposal has not been designed or sited to adapt to current and future risks from climate change. Urban centres are already impacted by severe weather, especially flooding and storms. The hard standing will cover the full extent of the site and introduces an impermeable surface with no details of drainage or soft landscaping included that could mitigate against its impact.

The proposal does not accord with **Policy 2 on climate mitigation and adaption**.

Policy 3. Biodiversity

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.

3(c) Proposals for local development will include appropriate measures to conserve, restore and enhance biodiversity, in accordance with national and local guidance. Measures should be proportionate to the nature and scale of development.

Comment:

The proposal seeks to remove all soft landscaping and trees within the site. The proposal is also void of any form of biodiversity enhancements. Had the proposal been supported then a Preliminary Ecological Appraisal of the vegetation to be removed and a survey for protected species that might be present would have been required.

The proposal would also have had to include conserving the existing vegetation and trees and consider incorporating bio-diversity enhancements.

The proposal does not accord with **Policy 3 on biodiversity**.

Policy 6: Forestry, woodland and trees

Development proposals that enhance, expand and improve woodland and tree cover will be supported.

Comment:

As stated, the proposal involves the removal of all trees on site. Were the proposal to be supported, a tree survey would be required and the expectation would be that trees be protected in relation to design, demolition and construction. Given that the intention is to refuse the proposal, this information has not been requested. There are too many issues with the proposal to seek further details.

The proposal does not accord with **Policy 6: Forestry, woodland and trees.**

Policy 9. Brownfield, vacant and derelict land and empty buildings

This policy 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.

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. In determining whether the reuse is sustainable, the biodiversity value of brownfield land which has naturalised should be taken into account.

Derelict buildings and spaces are regenerated to improve wellbeing and transform our places.

Comment:

Whilst the principle of developing this brownfield, vacant site is acceptable. For the reasons already outlined, this re-development has not been considered with sustainability or bio-diversity in mind. The proposal is within a mixed-use area but located adjacent to residential properties. The design and use of this land will not improve wellbeing for locals nor will it have a positive impact on this site.

The proposal does not accord with **Policy 9. Brownfield, vacant and derelict land and empty buildings.**

Policy 13. Sustainable transport

Development proposals will be supported where it can be demonstrated that the transport requirements generated have been considered in line with the sustainable travel and investment hierarchies.

Comment:

It is not anticipated that this proposal will generate significant car borne journeys. However, further consideration will be given to other travel considerations under SG 11: Sustainable Transport below.

The proposal accords with **Policy. Sustainable transport**

Policy 14. Design, quality and place

a) Development proposals will be designed to improve the quality of an area whether in urban or rural locations and regardless of scale.

b) Development proposals will be supported where they are consistent with the six qualities of successful places:

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.

c) 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.

Comment:

The development proposals are not considered to improve the quality of the area. As stated above, the site is located directly adjacent to housing and, whilst vacant, has value in that mature trees and shrubbery bound most of the site and the land is largely grassed. Being on the corner of two streets, the proposed location is highly prominent and a proposal such as this here, particularly with the removal of all greenery surrounding the site, would not only be detrimental to this site but also to the wider streetscape. In terms of *Healthy: Supporting the prioritisation of women's safety and improving physical and mental health*, as stated above, the proposal does not provide any form of passive surveillance nor does it encourage active lifestyles, through the creation of walkable neighbourhoods. It should be noted that this route leads to Copeland Road and Ibrox underground station.

The proposal is not consistent with a number of the 6 qualities of successful places particularly, Healthy, Pleasant, Distinctive and Sustainable.

Given the above, the proposal does **not** accord with **Policy 14 on design, quality and place**.

Policy 20. Blue and green infrastructure

a) Development proposals that result in fragmentation or net loss of existing blue and green infrastructure will only be supported where it can be demonstrated that the proposal would not result in or exacerbate a deficit in blue or green infrastructure provision, and the overall integrity of the network will be maintained. The planning authority's Open Space Strategy should inform this.

b) Development proposals for or incorporating new or enhanced blue and/or green infrastructure will be supported. Where appropriate, this will be an integral element of the design that responds to local circumstances.

Design will take account of existing provision, new requirements and network connections (identified in relevant strategies such as the Open Space Strategies) to ensure the proposed blue and/or green infrastructure is of an appropriate type(s), quantity, quality and accessibility and is designed to be multifunctional and well integrated into the overall proposals.

e) Development proposals that include new or enhanced blue and/or green infrastructure will provide effective management and maintenance plans covering the funding arrangements for their long-term delivery and upkeep, and the party or parties responsible for these.

Comment:

This policy seeks to "To protect and enhance blue and green infrastructure and their networks." As stated, the proposal will see the removal of all shrubbery and trees from the site and does not include proposals for any form of landscaping or enhanced green infrastructure.

The proposal does **not** accord with **Policy 20: Blue and green infrastructure**

Policy 22: Flood risk and water management

The proposal 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.

Comment:

This proposal will essentially replace an area of greenspace with hard standing and no consideration has been given to introducing any form of natural drainage or drainage in any capacity. The implications of this are that the proposal is likely to create drainage issues and overheating locally.

The proposal does **not** accord with **Policy 22: Flood risk and water management**

City Development Plan**CDP1: The Placemaking Principle & SG 1 – Placemaking**

Policy CDP1 is an overarching Policy which must be considered for all development proposals to help achieve the key aims of the Glasgow City Development Plan. This Policy aims to improve the quality of development taking place in Glasgow by promoting a design-led approach. This will contribute towards protecting and improving the quality of the environment, improving health and reducing health inequality, making the planning process as inclusive as possible and ensuring that new development attains the highest sustainability levels.

In order to be successful, new development should aspire to achieve the six qualities of place as defined in draft Scottish Planning Policy, and reinforced by Creating Places and Designing Streets.

- *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.*

Comment:

As stated above, a significant concern with the proposal is the impact it will have visually, particularly given its prominent location on a corner plot. The development proposals are not considered to improve the quality of the area, nor will it reduce health inequalities. As stated above, the site is located directly adjacent to housing and, whilst vacant, mature trees and shrubbery largely bound the site. The removal of this greenery and its replacement with hard standing and large storage containers would be detrimental to this site and the wider streetscape.

The proposal is not consistent with a number of the 6 qualities of successful places particularly, Healthy, Pleasant, Distinctive and Sustainable.

The proposal is contrary to **CDP1: The Placemaking Principle & SG 1 – Placemaking**

*Supplementary Guidance **SG1 ‘Placemaking’** comprises two parts. Part 1 provides the context and approach of Placemaking established in Policy CDP1 and Part 2 contains detailed assessment criteria for small-scale development and the relevant policies are copied below.*

CDP2 Sustainable Spatial Strategy:

This policy provides a spatial representation of The Plan’s strategy, with a strong emphasis on placemaking, health and wellbeing, and sustainability. To achieve the aim of the policy, it is recognised that intervention is required in some areas of the City. The Policy therefore highlights that Spatial Supplementary Guidance will be prepared for these priority areas in accordance with the Sustainable Spatial Strategy.

The proposal has also been assessed against the terms of relevant Supplementary Guidance in the CDP. Details of this are provided below:

CDP 6/IPG 6 – Green Belt & Green Network

CDP6 seeks to ensure that new development will not adversely affect the existing Green Network, but will help deliver an enhanced/extended Green Network. The Green Network consists of a variety of elements – from strategic hubs (e.g. parks), through connecting corridors and links (e.g. waterways or walkways/cycleways) down to small scale elements (such as local open spaces, hedgerows or green roofs). Many of these elements are protected as sites designated for their nature conservation or landscape importance or through inclusion in the Council's Open Space Map.

New development should not have an adverse impact on the Green Network. However, there may be instances when the social or economic benefits to be gained from a development affecting the Green Network would clearly outweigh the benefits of the Green Network as it currently exists. In such circumstances, it is important that suitable mitigation is provided to compensate for the impact of the development on the Green Network. This should ensure that the key Green Network functions of the development site are not lost, but are replicated and enhanced, either through direct provision elsewhere on the site (eg by maintaining continuity of habitat corridors), in the vicinity of the site (where this can be appropriately controlled), or through a developer contribution, to be used by the Council for such purposes.

Comment:

As stated above, had the proposal been acceptable, a Preliminary Ecological Appraisal, including a survey for protected species would have been requested given the extent of vegetation surrounding the site. However, there are numerous reasons as to why this proposal will not be supported and so it would be futile to request this information when this would not change the outcome. The IPG 6-Green Belt and Green Network Map identifies a strip of land on the boundary of the site as 6.33 Amenity Greenspace Transport. This land is important as it helps deliver better places and a more successful, healthy and biodiverse Glasgow. No attempt has been made to retain and enhance this, particularly considering that the site is located adjacent to residential uses and the impact its removal would have.

The proposal does not accord with **CDP 6/IPG 6 – Green Belt & Green Network**.

CDP 7/SG 7 – Natural Environment

Policy CDP 7 states that the Council expects that all development proposals shall be based on an understanding of the characteristics of the site, including any possible geodiversity, wildlife or habitat significance. This should be done as part and parcel of a wider placemaking approach, and prior to site clearance/preparation works beginning. The extent to which appraisal is required will depend on the scale, nature and location of the proposal.

The Council expects that all development proposals shall be based on an understanding of the characteristics of the site, including any possible geodiversity, wildlife or habitat significance. This should be done as part and parcel of a wider placemaking approach, and prior to site clearance/preparation works beginning. The extent to which appraisal (and any follow up survey work) is required will depend on the scale, nature and location of the proposal.

ENHANCING BIODIVERSITY

The City Development Plan promotes a Placemaking approach to new development, intended to deliver benefits for people and nature.

Development shall not result in a loss of biodiversity or habitat connectivity. Wherever possible, development shall enhance biodiversity and/or habitat connectivity. New

developments shall aim to incorporate existing habitats, enhance and expand them and/or help create new habitats as well as enhancing the ecosystem services that the development site currently supports, or could support. This can involve protecting and incorporating existing habitat features such as hedges, trees, ponds, streams, wetlands and even derelict areas into plans.

Specific reference is made to how biodiversity can be enhanced with respect to Open Space and Recreation.

- *Link to existing green corridors and design for multifunctionality*
- *Incorporate green infrastructure into on and off-road access routes*
- *Plant hedges and trees, create wetlands*
- *Design for longer grass and wildflower grassland*

Mitigation

The Mitigation Hierarchy shall apply when considering how to manage the risks of adverse impacts on wildlife and habitats. In line with the Mitigation Hierarchy, the Council expects that development proposals be designed to prevent or avoid impacts. If this is not possible, then development may be acceptable if appropriate measures are put in place to minimise and reduce any unavoidable impact, such as compensatory planting or habitat provision (this may also be required in conjunction with efforts to reduce impact). If adverse impacts cannot be avoided, reduced and/or compensated, to the satisfaction of the planning authority, development proposals shall be refused.

Comment:

No attempt has been made to consider the development of this site from a wider Placemaking perspective. Had the proposal been supported then a tree survey would have been requested and the expectation would be that trees be protected in relation to design, demolition and construction.

No consideration has also been afforded to biodiversity or habitat connectivity and the resultant impact of the removal of all shrubbery from the site. Normally, a Preliminary Ecological Appraisal of the vegetation that is going to be removed and a survey for protected species that might currently be using the site would also have been requested. However, considering the number of issues with the proposal, this additional information was not requested.

The proposal does not accord with **CDP 7/SG 7 – Natural Environment**

CDP 8/SG 8 – Water Environment

Applicants will be required to demonstrate that proposals contribute to:

- *minimising and reducing flood risk;*
- *avoiding any increased risk of flooding from any source either within the development site, or outwith the site as a consequence of the development; and*
- *avoiding any increase in the quantity and rate of surface water run-off from any site.*

Comment:

The proposal site has not been identified in the Councils mapping system as being liable to flooding. That said, the site which is currently grassed but this will be replaced in its entirety (1480m²) by hard-standing. Given the extent of the area impacted, a Flood Risk Screening Checklist should have been provided in order to determine whether a Flood Risk Assessment might be required.

No form of mitigation strategy is proposed and no information regarding surface water drainage is included in the submission.

The proposal does not accord with **CDP 8/SG 8 – Water Environment.**

CDP 11/SG 11 – Sustainable Transport

SG 11 supports CDP 11 by providing guidance on how development proposals will be expected to address the transport implications that they give rise to.

Comment:

It is unlikely considered that this proposal will generate significant car borne journeys.

	However, with reference to Drawing Proposed Site Plan,31161/2A, dated 15th January 2024, it is noted that the containers are approximately 2.591 m in height and that the fence is 2.1 metres in height and that both are built up to the corner at the junction of Woodville Street and Clynder Street and also fronting the site. This would require a redesign of the fencing at the site access and the likely reduction of containers at the site boundary with Clynder Street. A swept path analysis would also have been required to demonstrate that all vehicles could ingress and egress the site as reversing out of the site would not be acceptable. The site access and at Clynder Street and the junction at Clynder Street /Woodville Street at the site edge would have to demonstrate suitable vehicular visibility splays as per National Roads Development Guide guidance. Pedestrian inter-visibility would also have to be included in the design. A S56 would be required for any new access/es or and any footway reinstatements/ street furniture and/or lighting columns requiring relocation. This would be at the expense of the applicant and the prior written agreement of the Planning Authority. In the absence of the information outlined above, the proposal does not accord with CDP 11 and SG 11. Conclusion In terms of issue (a), the proposal is not considered to accord with the Development Plan and NPF 4 as it is contrary to NPF4, Policy 1: Tackling the climate and nature crises, Policy 2: Climate mitigation and adaptation, Policy 3: Biodiversity, Policy 6: Forestry, woodland and trees, Policy 9: Brownfield, vacant and derelict land and empty buildings, Policy 14 Design, quality and place, Policy 20: Blue and green infrastructure and Policy 22: Flood risk and water management and to City Development Plan policies CDP 1/SG 1- Pacemaking, CDP 2 – Sustainable Spatial Strategy, CDP 6 & IPG 6 – Green Belt & Green Network, CDP 7 & SG 7 – Natural Environment, CDP 8 & SG 8 – Water Environment and CDP 11 & SG 11 – Sustainable Transport The proposal would introduce an industrial use to a corner plot whose adjacent uses are residential. Whilst it is acknowledged that industrial uses are prevalent in the area these tend not to permeate into the residential area, especially, a use such as this which is considered incompatible with it. Also, given the intension to remove all trees and shrubbery within and bounding this prominent site, the visual impact of this is considerable. The loss to bio-diversity and failure to consider this impact is unacceptable and will not deliver the better, healthier and more bio-diverse Glasgow which the Development Plan strives to achieve. The proposal fails to include measures to reduce flood risk and is likely to contribute to localised flooding. The proposal has also failed to properly consider driver and pedestrian safety as visibility splays where required are not included. In conclusion, the proposal will not contribute towards protecting and improving the quality of the environment, improving health and reducing health inequality. The proposal is incompatible with the 6 qualities of place and, as such, should be refused. In respect of (b), other material considerations include the views of statutory and other consultees and the contents of letters of representations. SPT were consulted and their feedback considered as part of the assessment. The issues raised in the representations are considered to have been addressed in this report. On the basis of the foregoing, it is recommended that this application for Full Planning permission be refused.
Recommendation	Refuse

Date: 25/06/24	DM Officer	Eileen Dudziak
Date <u>02/07/2024</u>	DM	Ross Middleton

Manager
