

JordanhillCommunity Council

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GLASGOW CITY COUNCIL

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FAO: Ms. Karen Rattray, Planner.

19 April 2017

Application Ref: 17/00470/DC

Site: Scotstoun Leisure Centre 112 Danes Drive Glasgow G14 9HD

Proposal: The Erection of 3 Spectator Stands for a Temporary 2 Year Period for Seasons 2016-18 inclusive.

Application Type: Full Planning Permission

Jordanhill Community Council (JCC) hereby makes representation against the application for full planning permission ref: 17/00470/DC submitted by the Applicant – Glasgow Life (GL).

The policy references and material considerations made in this letter of objection refer to Glasgow City Plan 2 (2009) not the City Development Plan that was adopted on 29 March 2017.

In accordance with Planning Advice Note 3/2010: Community Engagement, Standard 41, the Applicant has not exercised their legal obligation to meet with JCC as a statutory consultee during Pre-Application Consultation (PAC). JCC was cited on the PAN dated 26 June 2016. This affects the integrity of the application and requires to be directed by Development Management.

The departures from the consented redevelopment parameters for Scotstoun Sports Stadium are significant and adversely related to the Planning Decision Notice issued on 04 April 2007 that granted District Approval for Application 06/03936/DC: 'Demolition of existing South Stand and Pavilion and erection of new South and North Stands, upgrading of pitches, relocation of floodlights and extension to front of Leisure Centre with additional parking on site'.

Glasgow City Council's Executive decision in 2011 to bring professional rugby to Scotstoun Stadium was independent of any public consultation. This ameliorating self-regulation response presented an ultimatum of 15 home matches with associated environmental impacts at Scotstoun Stadium. This undemocratic approach is being further exploited by GL at the expense of the residential amenity in this application.

The Planning Authority averted community engagement by granting on 18 July 2016 a Certificate of Lawfulness for Application: 16/01486/DC for the Installation of an all-weather, synthetic grass surface as replacement of the existing natural grass pitch infield at Scotstoun Stadium. This has effectively amplified the bias towards rugby.

Representation against the application protects City Plan Policy DEV 11: Green Space which contributes positively to the setting of a Conservation Area and stability of the wider residential amenity. This also defends the scale, height and massing of the public services sports facility. The application site is NOT governed by Policy DEV 10: Stadium that is applied to the City's main sports arenas and stadia that include supporting uses such as ancillary offices and parking facilities, which relate to their primary function as sports arenas and stadia. The latter criteria appear to be applied at Scotstoun Stadium to embrace Scottish Rugby Union's commercial objectives.

The application is for full planning permission being qualified by a condition for a specified period. Should this be granted, for a two year term it would facilitate permission on a permanent basis. Little or nothing has been proposed in the application, which will mitigate or minimise the disruption to a residential area from what has become a major centre for professional rugby football.

The issue of a Planning Certificate shall enable the prescribed conditions for granting a permanent licence for the facility under the Licensing (Scotland) Act 2005. The Pavilion at the NE corner of the site along with a temporary marquee provides bar and covered area during match days, the application does not identify scale and massing relationships of these functions.

The intrusiveness of raised structures (temporary spectator grandstands) on this site without a planning certificate for the last three seasons represents a significant change in the physical state of locality. This 'development-creep' approach is presented as legitimate, 'a golden era of sport', a 'trial period', a flexibility of circumstances to allow sufficient time to assess any impacts to determine, if feasible, a future development approach. It is JCC's view that such actions have prejudiced the effectiveness of the planning process. Adequate time has already been given to GL to comprehensively assess all impacts and disclose in the public's best interest the future of this urban site that includes protection of green space, biodiversity and neighbouring allotment gardens.

JCC letters dated 01 August 2016 and 27 February 2017 invited the Applicant to declare the long term intentions for Scotstoun Stadium to benefit pre-application consultation objectives and help make effective representation. These letters received no response.

The Application drawings do not associate with the alleged primary stadium user groups; there are no references to athletics, other sports or premises used for hospitality.

City Plan 2 Development Principle Policies

Under the Planning etc. (Scotland) Act 2006 the major application is contrary to City Plan 2 Development Principle Policies:

- 1 ENV 1 - Open Space Protection.
- 2 ENV 2 - Development related to Greenspace.
- 3 TRANS 2 – Development Locational Requirements.
- 4 TRANS 4 – Vehicle Parking Standards

The Erection of 3 Spectator Stands for a Temporary 2 Year Period for Seasons 2016-18 inclusive as shown on the following application drawings:

- | | | |
|-----|-------------------|---|
| (a) | AL (00)001: | Location Plan |
| (b) | AL (00)002: | Site Plan as Existing |
| (c) | AL (00)003 REV A: | Site Plan as Proposed |
| (d) | AL (00)007: | Street Elevation & Site Section as Proposed |

As described on the following statements and assessments;

- (e) Public Consultation Report of 23 March 2017 prepared by DRS Project Management and Design.
- (f) Design & Planning Statement of February 2017 prepared by Mott MacDonald.
- (g) Transport Assessment of February 2017 prepared by Mott MacDonald.
- (h) Travel Plan of February 2017 prepared by Mott MacDonald.
- (i) Noise Assessment of November 2016 prepared by Mott MacDonald

Public Consultation Report

The Public Consultation Report is assumed to be the Pre-Application Consultation (PAC) Report dated 23 February 2017 in relation to the Planning Application 17/00470/DC. The PAC Report is misleading and does not represent a true and accurate account of relevant events from the Proposal of Application Notice (PAN) issued on 27 June 2016. JCC responds as follows:

Pg.3, Item 1 Introduction, Para 4 states:

'Audience demand has steadily increased each year, requiring increased seating capacity, achieved by the installation of temporary grandstands. These installations have previously been covered by Section 89 Certificates'.

Response:

The requirement under the Planning etc. (Scotland) Act 2006 for a Planning Certificate has been obstructed by Glasgow City Council (GCC) sequentially sanctioning the alleged breach of planning control on the site. This has been achieved by supporting repetitive certification every 28 calendar days for continuous periods of up to ten months for raised structures under the Civic Government (Scotland) Act 1982, Section 89: Raised Structures avoiding the need for granting under the Building (Scotland) Act 2003, Regulation 3 Temporary Buildings a Building Warrant during seasons: 2015/16, 2014/15 and 2013/14. This has been referred to the Scottish Public Services Ombudsman.

'The 2016-2018 seasons are projected to draw even larger numbers of spectators'.

Response:

This statement suggests that the spectator levels are unlimited.

JCC PAC letter of 01 August 2016 sought clarification that proposed spectator numbers be restricted to a level no greater than 7,335 (statutory occupant capacity 4,765 + 2,570). No response received.

JCC concludes that should planning permission be granted the Applicant under the Civic Government (Scotland) Act 1982, Section 89: Raised Structures can legitimately increase capacity beyond 7,335 within the compliant 28 day period. A legal agreement is required to prevent this happening and defer high capacity games to an alternate and more suitable venue.

Public Consultation Report – Continued

Item 01 Introduction Pg.3, Para 7 states:

'In recognition of the impact which increased match attendance has on surrounding streets, and in compliance with planning application requirements, Glasgow Life has organised and managed a series of pre-application community engagement meetings with local community councils and interested neighbours, assisted by Glasgow Warriors, DRS Project Management & Design, and specialist transport consultants Mott MacDonald'.

Response:

As part of the public consultation a correct commitment was given to organise meetings with the Community Councils cited on the PAN.

DRS Project Management and Design as Agent was not represented at the public meetings.

Scottish Government's Planning Advice Note 3/2010: Community Engagement, Standard 41 states that the prospective applicant must consult with every community council whose area is within or adjoins the application site. This is reflected on the PAN. Therefore, the prospective applicant has a legal obligation to exercise open and compliant PAC meetings.

No PAC meeting was held with Jordanhill Community Council. Our statutory role and responsibility has been obstructed by the failure to meet our reasonable expectations set-by the National Standards for Community Engagement.

JCC letters of 22 and 11 December 2016 addressed to the Director of Governance and Solicitor to the Council, FAO PAN Nominated Person requesting a meeting received no response. This has been referred to the Head of Democratic Services and invites action by the Planning Authority.

Pg.4, Item 2 Site Location

This item does not describe the setting and character of the area surrounding the site that affects interpretation of the application. City Plan Policy DES 3: Protecting and Enhancing the City's Historic Environment is considered relevant.

The urban grain is residential, stable in character and consists largely of medium density terraced housing dating from the early to mid-20th Century. To the south of the site is the Conservation Area of Scotstoun bounded by the residential amenity of Whiteinch. To the north there are allotment gardens bounded by the railway with proximity to elevated traditional and modern flatted developments on Southbrae Drive, Southbrae Gardens. To the east, Victoria Park Nature Walk, Westland Drive, Victoria Park and Victoria Park Drive North. To the west lie traditional and modern flatted developments of Northland Drive, Scotstoun.

Public Consultation Report – Continued

Pg.4, Item 3 Site History

This item does not describe in full the planning history of the site that affects interpretation of the application.

The Planning Authority on 18 July 2016 issued a Certificate of Lawfulness for Application: 16/01486/DC for the Installation of an all-weather, synthetic grass surface as replacement of the existing natural grass pitch infield at Scotstoun Stadium.

The Planning Applications Committee that recommended that District Approval be granted for Application 06/03936/DC accepted limitations associated with development size, spectator capacity, frequency and nature of events held at Scotstoun Stadium and approved building on the site controlled by the existing footprints of the north and south stadia. It is significant to note that the Committee accepted that the proposed development approach was described as the upgrading of existing facilities that was directly related to the use of the particular area and was in accordance with policy DEV 11: Green Space.

Due to departures from the Planning Decision Notice dated 04 April 2007 that granted District Approval for Application 06/03936/DC environmental and transport tension has been significant due to the prolonged use and adaption of temporary spectator grandstands that increase spectator attendances in excess of the approved statutory capacity. Such tension can be attributed in-part to the absence of a Green Travel Plan that was a material consideration in granting planning consent in compliance with TRANS 4: Vehicle Parking Standards. GL under FOI GL049/16 disclosed that they do not hold a document referred to as the Green Travel Plan. This has been reported to the Planning Authority and shall be taken into consideration during evaluation of the application.

In September 2011 GCC's Executive approved the SRU request for Glasgow Warriors home matches to be played at Scotstoun Stadium from season 2012/13 onwards, and that there were no adverse environmental implications, as a green travel plan policy was in place for mode sharing controlled by the statutory occupant capacity. The Executive may have been misled in their decision making.

Public Consultation Report – Continued

Pg.5, Item 04 Proposed Development states:

'Installation of three temporary, covered spectator grandstands. One each located behind the two goal lines, and the third located in the corner between the west and north grandstands'.

Response:

The Site Plan as Proposed Drawing Ref: AL (00)003 REV A was not presented during PAC Public Meetings.

PAN Drawing AL (00)001 – Scotstoun Stadium Proposed Temporary Grandstands was the only drawing provided during PAC. JCC letter 05 July 2016 gave notification that this drawing is misleading in terms of inaccuracies in scale, areas and capacity and was not revised nor presented at PAC Public Meetings.

PAN: Project Description, Item 03 Existing site usage and ownership paragraph 3 states: 'In season 2015 – 16 the Stadium operated with a spectator capacity of 6650, spread across two permanent stands (north and south – 4681 combined) and two temporary stands (east and west – 1969 combined). There was also an additional optional standing capacity of 150, for use if and when the seated capacity is sold out.

According to verified statistics established by GL - FOI disclosure, Scotstoun Stadium has a total occupancy capacity of 4,765 comprising of the North Stand at 1,252 and the South Stand at 3,513.

The option of additional standing capacity of 150, for use if and when the seated capacity is sold out relates to the statutory occupant capacity of 4,765. On 14 April 2017 for the home game against Zebre 100 additional standing tickets were advertised in addition to the use of temporary spectator grandstands.

JCC questions the 2,570 occupant capacity of the temporary spectator grandstands as the east and west raised structures were modified increasing capacity during PAC. Our letter of 26 January 2017 requesting a site visit was intended to clarify this position. However, with no response received this requires to be verified by the Planning Authority.

Public Consultation Report – Continued

Pg.6, Item 5 PAN Notice and Public Advertisement states:

The Proposal of Application Notice form and accompanying documents were submitted to DRS Planning & Development Control on 12-07-2016.

Response:

A revised Pre-Application Notice (PAN) was served by Email by Agents Development and Regeneration Services, Project Management & Design (PM&D) on 27 June 2016 to: Jordanhill Community Council, Scotstoun Community Council, Whiteinch Community Council, Victoria Park Residents' Association, Friends of Victoria Park, Victoria Park, City of Glasgow Athletics Club, and Scotstoun Conservation Area Residents' Association.

The Agent advised that all enquiries should be addressed to the person named in the PAN, for the duration of the minimum twelve week consultation period. NB: not to DRS PM&D, not to the Planning Department.

GL gave notification by email on 24 June 2016 (17:27) to withdraw the PAN dated 16 June 2016 due to an administrative error.

Pg.6, Item 6 Public Meetings:

This item does not describe the consultation strategy nor differentiate between statutory PAC meetings and those meetings qualified by the prospective Applicant.

GL organised three (3) public meetings at Scotstoun Stadium on 30 June, 26 July and 17 August 2016. The strategy for engagement was confirmed that the first two meetings would focus on discussing relevant community issues with the third dedicated to allowing the prospective applicant the opportunity to present their emerging proposals to accommodate community opinion.

The meeting of 09 August 2016 was a Scotstoun Events Pre-Planning Meeting, not a PAC Meeting.

No design proposals were presented at the final public meeting on 17 August 2016, nor was any opportunity given to discuss planning policies, constraints, opportunities or limitations within which decisions be taken.

The Additional Meeting of 05 December 2016 was qualified as not being a PAC Meeting but dedicated to transport impact matters. JCC wishes to place on record that this meeting coincided with the Jordanhill Community Council meeting and could not be supported. The prospective applicant was notified and proceeded with the meeting. No record of apology appears on the Minute.

Public Consultation Report – Continued

Pg. 8, Item 07: Summary of Feedback states:

Copies of meeting minutes and correspondence received from all members of the public are contained in the appendices. The main concerns were overwhelmingly focused on the impact of additional vehicles and pedestrians on: Parking provision in the local streets, and Road safety in the local streets.

Response:

The Prospective Applicant did not timeously distribute Record of Meetings to PAN cited statutory consultees and/or community groups to invite comment on content and accuracy.

Under 3/2010, Community Engagement, Standard 44 states that: 'As part of the pre-application consultation report, applicants should set out how they have responded to the comments made, including whether, and in what way, the proposals have changed as a result of this consultation'.

JCC engaged in the PAC by design and distributing over 1,500 leaflets giving notice of Public Meetings. This was initiated by issue of PAN on 16 June 2016 which was subsequently withdrawn and replaced by the PAN on 27 June 2016. This necessitated printing and distribution of a revised notification leaflet - GL agreed to meet the costs. The Public Consultation Report does not acknowledge JCC's support for the PAC process.

Table 1: PAC Correspondences show letters of engagement sent by Email to the Director of Governance and Solicitor to the Council, FAO - PAN Nominated Person. The majority of these have not been responded to by the prospective applicant. It is significant to note that they are NOT included in the Public Consultation Report Appendices. Refer to Appendix A: PAN Correspondences.

JCC letter of 26 January 2017 requests as part of PAC to visit the site to inspect the 'raised structures' (Temporary Spectator Grandstands). It was proposed that the visit should include Scotstoun and Whiteinch Community Councils. No response received.

Table 1: PAN Correspondences

DATE OF LETTER	DATE OF LETTER
27 February 2007	22 August
26 January	03 August
12 January	01 August (1)
22 December 2016	01 August (2) – GL response 12 September
11 December	05 July
31 October	12 July
26 September – DRS response 14 October	10 July (1) GL response 06 July
14 September	10 July (2)
31 August	

Public Consultation Report – Continued

Pg. 8, Item 07: Summary of Feedback states:

Concerns regarding procedural matters relating to the PAN and the planning consultation process were expressed vocally and via email by one representative of Jordanhill Community Council. This included several Freedom of Information Requests.

Response:

JCC is governed by standards set by the Scheme of Establishment of Community Councils 2013. The Constitution cites Membership of ten (10) Community Councillors. No single member acts independently without the authority of a quorum. All communications issued are on corporate stationary, represent the membership and are distributed accordingly. Letters are signed by either the Chairperson or Secretary and on occasions by both elected office bearers. To highlight in the context of a Public Consultation Report 'one representative' is considered to be misleading and discriminatory. The Planning Authority is invited to report this relevant event to the Head of Democratic Services.

Due to lack of transparency in the PAC process, it was deemed necessary to raise under the Freedom of Information (Scotland) Act 2006 requests for disclosure of information associated with the operation and management of Scotstoun Stadium. It should be noted that key FOIs that we consider to be in the public's interest have not been disclosed and are presently subject to review with potential referral to the Scottish Information Commissioner.

Pg. 8, Item 07: Summary of Feedback states:

'Many expressions of support were received in favour of the proposed development. These recognised the many benefits brought to the area by the presence of Glasgow Warriors Rugby Club at Scotstoun'

Response:

The PAC Report has an obligation to be representative and balance all community feedback. It should not be used as a propaganda device.

Public Consultation Report – Continued

Pg. 8, Item 07: Summary of Feedback states:

It is reasonable to conclude that there is both strong support for the proposed temporary grandstands, and concerns on the part of local residents in relation to match-time traffic. In considering this it should be kept in mind that home matches generally occur only 15 times per year, and that the period of disruption is restricted to the periods of arrival and dispersal, in the order of 1 hour each, pre and post-match.

Response:

This statement makes alarming assumptions. There is no evidence to support the conclusion that there is strong support for either the temporary grandstands or the number of home matches.

There are no Good Neighbour Agreements and/or Legal Agreement in place to protect the residential amenity. Match specific risk/safety planning to coordinate all appropriate partner agencies and emergency services appear to be absent.

The amenity of neighbours is significantly impacted upon by the period of disruption being well in excess of one hour each, pre and post-match day. Negative social behaviour is also evident with spectators urinating in unadopted private lanes and amenity green spaces.

The community's policy reference points revert back to 2007 and 2008. On 24 May 2007 GCC contacted those residents who lodged objections to the proposed redevelopment of Scotstoun Leisure Centre, which the average numbers that attend rugby matches is more likely to be around 1,500 rather than 3,500. Under the Roads (Scotland) Act 1984 GCC procured and enforced a Scotstoun Permanent Traffic Regulation Order to provide protected car parking during relevant events held at Scotstoun Stadium. This was restricted to the residential avenues of Scotstoun and was justified by four (4) annual relevant events with average attendances of 1,500 to be held at Scotstoun Stadium.

Pg.9 Item 08: Traffic Impact Assessment:

Refer to Design and Planning Statement.

Pg.10 Item 09: Challenges and Mitigation Measures:

Planning Decision Notice dated 04 April 2007 that granted District Approval for Application 06/03936/DC mandated a Green Travel Plan as a material consideration in granting planning consent in compliance with TRANS 4: Vehicle Parking Standards.

In the absence of a Travel Plan challenges and mitigation measures are uncontrolled and without merit.

Design and Planning Statement February 2017

The Design and Planning Statement does not provide a comprehensive portfolio to allow interpretation. It is this Community Council's view that there are material considerations that justify a deviation from City Plan Development Policy. Comments are:

1 Introduction. No comment.

2 The Proposal

2.1 Development Proposal

Scotstoun Stadium has a total occupancy capacity of 4,765 comprising of the North Stand at 1,252 and the South Stand at 3,513. The application for temporary spectator grandstands proposes to increase the capacity by 2,570 to total 7,335, not 7,351 as stated.

Layout, Scale, Design and Materials are not described to support the Application. Compliance is required with policy DES 1: Development Design Principles.

Air quality is high on the local public agenda. Traffic congestion on Victoria Park Drive North and Westland Drive takes around 40 minutes to dissipate on match days. Policy TRANS 9 should consider the likely air quality impacts, in relation to the level of projected traffic generation with suitable mitigation measures identified.

2.2 Location

Refer to Pg.5 – Site Location, Public Consultation Report.

2.3 Parking / Access

Consideration should be given to dedicate all site parking to support rugby events. Leisure Centre Opening Times require to be adjusted accordingly.

JCC welcomes improved pedestrian and cycle accessibility at the North West Corner of the site, however greater connectivity could be achieved by reinstatement of entrances onto Danes Drive and extending Victoria Park Nature Walk to connect with Crow Road. The proposed NW entrance and pathway connectivity will require to be upgraded to meet with health and safety standards and should be part of this planning application.

Design and Planning Statement February 2017 – Continued

2.4 Noise Impact Assessment

JCC notes that both baseline levels and match-day levels were predicted to be above the criteria stated in the WHO guidelines. However, levels were not shown to exceed the baseline levels by more than 3dB at any receptor and as such would not be considered a significant impact.

No qualification of spectator numbers support the aforementioned findings so it is difficult to gauge whether the resultant 3dB levels represents an average game or an over capacity game. Results are needed from the latter to assess the maximum impact on residents.

Drawing AL(00)007 Street Elevation and Site Section as Proposed shows the elevated topography to the north of the site. This acts like an amphitheatre for low frequency sound reverberation. Residential properties on Southbrae Drive and Southbrae Gardens are impacted upon by noise. Data evidence is required from Db receptors in this area for evaluation.

2.5 Planning History

The site has planning history that is a material consideration in making representation against the application ref: 17/00470/DC.

2.6 Assessment of Proposal against Planning Policy

Under the Planning etc. (Scotland) Act 2006 the major application is contrary to City Plan 2 Development Principle Policies:

- 1 ENV 1 - Open Space Protection.
- 2 ENV 2 - Development related to Greenspace.
- 3 TRANS 2 - Development Locational Requirements.
- 4 TRANS 4 - Vehicle Parking Standards.

Design and Planning Statement February 2017 – Continued

ENV 1 – Open Space Protection

The commercially orientated development is contrary to policy DEV 11: Green Space and results in significant loss of amenity open space. The green space designation is in close proximity to the community it serves, and is demonstrably special to our environment. It holds a particular local significance, because of its historic significance, and recreational value including as a playing and athletics field.

Drawing AL(00) 003 Rev A: Site Plan as Proposed identify the location of east and west temporary stands as occupying the standard layout of an IAAF competition certified athletics running track. These segments are deemed part of the main playing surface and are functionally, visually and aesthetically associated with recreational, sports and athletics uses. This is a negative design because these features do not in general improve the qualitative effect of the stadium; poor design resulting from the three temporary spectator stands will disadvantage athletes and amateur sports. The temporary north-west stand that is aligned with the existing north stand is considered coherent and acceptable. This approach requires to be adopted at either end of the existing stadium accepting a limited increase in spectator capacity.

As far as we are aware there exists no other example where planning permission has been granted for stadia built on the playing surface end segments inside a competition certified athletics running track. In making this statement we are discounting retractable seating problems being encountered at West Ham's shared use of the Olympic Stadium.

ENV 2 - Development related to Green Space.

JCC cites a development management precedent made by the Planning Applications Committee in 2007 for Application 06/03936/DC that protected policy designated green space by granting consent to erect new stadia on the footprint of the existing buildings. We require that this decision be applied to the evaluation of the application.

Policy ENV 1: Open Space Protection ensures that all areas of formal and informal open space are protected from inappropriate development, in order to maintain or enhance the quality of life, health, wellbeing and amenity of the communities they serve and also promote sustainability and biodiversity.

In accordance with policy DEV 11: Green Space, there is a strong presumption in favour of the retention of all public and private green/open space. This is reflected in the National Planning Framework for Scotland 3.

Design and Planning Statement February 2017 – Continued

TRANS 2 – Development Locational Requirements

The site is located in the outer urban area and is Below Base Accessibility. This along with First Bus's recent deletion of the X4 service determines that there is inadequate public service transport to support the development. All public services points are outwith the 400m (Bus) and 600m (Train) catchments required by the policy. For the development to proceed requires the enhancement of public transport provision to at least Base Accessibility standards. City Plan 2: TRANS 2 - Development Locational Requirements; DG/TRANS 1 – Transport Assessments; DG/TRANS 2 - Travel Plans; DG/TRANS 3 - Public Transport Accessibility Zones require compliance.

TRANS 4 – Vehicle Parking Standards

City Plan Policy TRANS – 4 Vehicle Parking Standards require car parking provision. DES 1: Development Design Principles provide car park design considerations.

Scotstoun Sports Campus has a total of 426 general car parking spaces, 36 DDA compliant spaces and 33 bike racks. The Stadium has 209 general car parking spaces, 20 DDA compliant spaces and no bike racks. The site has limited provision to increase vehicle parking beyond this level..

Transport Assessment and Travel Plan February 2017 by Mott MacDonald

The TA and Travel Plans attempt to address the concerns of the surrounding community about the traffic management and car parking associated with events. Comments on the reports are:

The Consultant fails to reference the key City Plan 2 Development Guides - DG/TRANS 1: Transport Assessments and DG/TRANS 2: Travel Plans. Utilising these guides could have assisted in making stronger analysis, mitigation, legal enforcement, monitoring and proposals for corrective action.

JCC questions the 'no accident' no problem scenario with regards transport impact on residential streets along with inconsiderate parking.

The TA is flawed by NOT:

- 1 Including North Jordanhill, Southbrae Drive and its environs in the transport survey scope.
- 2 Maintaining confidentiality with regard surveys undertaken during home matches on Saturday 10 and Friday 23 September 2016.
- 3 Qualifying the spectator numbers on the surveyed days.
- 4 Determining whether the resultant parking represents an average game or an over capacity game.
- 5 Reporting the maximum impact on the residential amenity.
- 6 Taking account of the worst case scenario of spectator attendances of up to 10,000.
- 7 Taking account of organised events in Victoria Park that generate visitor parking coinciding with home-matches.

With regard the aforementioned the TA conclusions are open to challenge especially the statements:

- *'Approximately 50% of season ticket holders live one hour or more away from the stadium by public transport';*
- *'Match day occupancy of 85% or above was recorded on 16 of the 74 streets surveyed';*
- *'None of the parking areas surveyed, zonally exceed the 85% threshold for parking on match days;*
- *Based on evidence collated there is no clear justification for an extension of the restricted parking zone', and*
- *'On match days there is still remaining capacity in all zones'.*

Transport Assessment and Travel Plan February 2017 by Mott MacDonald - Continued

The TA with regard Traffic Behavioural Conclusion states that surveys have been undertaken with local community groups during match day periods. JCC were not invited to participate in such surveys to determine the reported observations. However, we remain concerned with regard road safety issues with poor inter-visibility for all road users.

The stadium has a total occupancy capacity of 4,765 not 4,781 as stated in the TA, comprising of the North Stand at 1,252 and the South Stand at 3,513. The temporary stands increase spectator provision by 2,570 resulting in a total of 7,335. Since professional rugby was brought to Scotstoun the proposed capacity of 7,335 has been exceeded on five (5) events as shown in Table 2: FOI GL036/16 Extract:

Table 2: FOI GL036/16 Extract

SCOTSTOUN STADIUM RUGBY EVENTS: FOI GL036/16 EXTRACT				
EVENT DATE	TYPE OF EVENT	TOTAL SPECTATOR ATTENDANCE	STATUTORY OCCUPANT CAPACITY	EXTRA SPECTATOR ACCOMMODATION
18.04.2014	PRO12	7,417	- 4765	= 2,652
26.04.2014	PRO12	8,855	- 4765	= 4,090
16.05.2014	PRO12	10,000	- 4765	= 5,235
16.05.2015	PRO12	10,000	- 4765	= 5,235
22.05.2015	PRO12	10,000	- 4765	= 5,235

Note: Figures do not take account of the 150 additional standing for use if and when the seated capacity is sold out.

JCC letter dated 01 August 2016 sought clarification from the prospective applicant that spectator numbers would be restricted, without qualification to a maximum capacity of 7,335. This is a key mitigation measure to put a cap on spectator attendance to avoid the extreme impact of traffic and parking can have on residents.

With no response being received it is assumed that should planning permission be obtained the Applicant under the Civic Government (Scotland) Act 1982, Section 89: Raised Structures shall increase capacity within the compliant 28 day period. By this interpretation development creep continues to manifest and cannot be controlled by a TA or Travel Plan.

The TA fails to record that GL under FOI GL049/16 disclosed that they do not hold a document referred to as a Green Travel Plan. The Planning Decision Notice dated 04 April 2007 granted District Approval for Application 06/03936/DC mandated a Green Travel Plan as a material consideration for compliance with TRANS 4: Vehicle Parking Standards. This is a breach of planning control and has impacted on the residential amenity.

Without Travel Plan (TP) management, effective discounted mode sharing control and regular monitoring any multi-platform marketing campaign by the Applicant's Tenants to encourage increased uptake in public transport by spectators is to be commended but limited to encouragement. Any mode share incentives require to be coordinated with a Travel Plan and could be made considerably stronger by including with a season ticket, vouchers for discounted (25% - 30%) public transport travel incentives.

Transport Assessment and Travel Plan February 2017 by Mott MacDonald - Continued

The TP car driver mode share target of 8% is very challenging but should be supported. It will require very extensive mitigation measures with significant intervention compared to what is currently undertaken or proposed. This is likely to require further high cost measures such as public transport support.

The TA with regard to public transport accessibility confirms that a Friday post-match egress has the poorest service support, with just 38% of season ticket holders able to reach home within one hour. While access is better on a Friday pre-match (19:00 – 20:00hrs), supporters are unlikely to use public transport to get to the stadium if there is not suitable transport available for getting home. The data reveals that for the majority of spectators who travel to and from the stadium by public transport in less than an hour is unrealistic. For some, travel by car will be the only viable form of transport to conveniently address this issue.

The TP car driver mode share target for staff of 45% is disappointing, particularly as Glasgow Warriors and Glasgow Life have significant control over how their staff travel to and from the site. This part of the Plan needs reinforcing.

For the TP to be effective it requires the backing of a legal agreement stating what the targets are, what new mitigation will be implemented and what corrective action will be taken should the targets be missed (e.g. further parking controls, investment in public transport).

It is noted that no spectator parking is provided within the Stadium grounds and that overflow Leisure Centre parking is provided at Thomas Aquinas School. This invites a change in management approach to coordinate professional rugby outwith the Leisure Centre opening times, therefore maximising on the site parking.

The TA confirms that Victoria Park Residents' Association has signalled its desire to see an extension of the zone to cover Victoria Park, Jordanhill and Whiteinch, and that the Applicant is willing to extend the match day parking control area. The Parking Survey conclusion is misleading and fails to recognise that a residential consensus in the form of a community petition has been accepted by GCC. The Sustainability and the Environment Policy Development Committee on 08 June 2016 noted a Report by the Executive Director of Land and Environmental Services (LES) entitled: Requests for Parking Controls. LES report ranked at no 2 the extension of Scotstoun PTRO to include South Jordanhill and parts of Whiteinch. The Committee directed LES to re-programme the current work plan to include the requests ranked 1 and 2 together with expected timelines; however a decision on the implementation of the schemes would be subject to feedback received during the consultation phase, costs and resources.

Under the Roads (Scotland) Act 1984 we await from LES the inception of the community consultation process with regard the procurement of the extension of Scotstoun PTRO to include South Jordanhill and parts of Whiteinch. Such actions are considered to be independent and not been seen as a bargaining-point for granting this application.

The effectiveness of the enforcement of Scotstoun's PTRO is questioned in terms of the apparent lack of Event Management Risk Planning required for each rugby fixture. This should follow the guidance in the "Guide to Safety at Sports Ground Publication 2008". A commitment is also required from GCC to increase the enforcement presence with offending vehicles removed.

Transport Assessment and Travel Plan February 2017 by Mott MacDonald - Continued

The management of traffic and pedestrian egress after a match onto Danes Drive is to be welcomed. The proposal to help ease this pressure by opening a new pedestrian access to the north west of the site would make an attractive route to Scotstounhill Station and the buses in Queen Victoria Drive. This proposal being important to public safety requires being part of the planning application.

In view of the problems caused by inconsiderate parking/waiting at junctions in South Jordanhill and at the Danes Drive entrance, the proposal to pursue a Traffic Regulation Order (double yellow lines) at these locations would seem a proportionate response, subject to local community agreement.

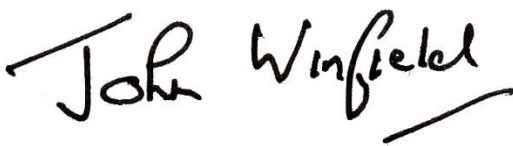
In conclusion in registering our objection to the Application 17/00470/DC we are reminded of the prospective applicants' answer to a key question asked during the final PAC public meeting:

Q. What is your contingency plan should planning permission be refused?

A. We would dismantle and erect the temporary spectator grandstands for every home game.

This is the mercenary approach that we expect the planning system to address in order to protect the public interest by rejection of this application.

Yours sincerely,



John Winfield,
On behalf of Jordanhill Community Council.



John Grierson,
On behalf of Jordanhill Community Council.

Enclosure: PAN Correspondences.

End of representation against LBC Application 17/00470/DC.

JordanhillCommunity Council

APPENDIX A

PAN CORRESPONDENCES

DATE OF LETTER	DATE OF LETTER
27 February 2007	22 August
26 January	03 August
12 January	01 August (1)
22 December 2016	01 August (2) – GL response 12 September
11 December	05 July
31 October	12 July
26 September – DRS response 14 October	10 July (1) GL response 06 July
14 September	10 July (2)
31 August	