



# Woodlands and Park Community Council

64 Barrington Drive  
Glasgow G4 9ET

GCC Application Ref: 16/00577/DC

7 April 2016

**The Executive Director  
Development & Regeneration Services  
Glasgow City Council  
229 George Street  
Glasgow G1 1QU**

Dear Sir

**SITE:** Site at Park Circus Lane/Park Quadrant Glasgow

**PROPOSAL:** Erection of residential development with associated car parking and landscaping.

**APP TYPE:** Full Planning Permission

This application was last discussed at the meeting of the Community Council on 9 March 2016, when it was agreed to make the following representation.

We object strongly to the proposal. Planning permission should be refused because the proposal is contrary to the development plan policies summarised immediately below (with selected examples) and there are no overriding material considerations that would outweigh the development plan policies.

***Scottish Historic Environment Policy 2011*** (1.2) special interest of the conservation area not restricted to 'master plan' and 'missing piece'

***Scottish Planning Policy 2014*** (138) and ***Glasgow and Clyde Valley Strategic Development Plan 2012*** (4.64) not a 'brownfield' site and projected surplus in this sector of housing supply

***City Plan 2 DES 1*** bizarre roof and skyline, residential density too high, increased through traffic, spoils view of conservation area from north, removal of healthy mature trees, ...

**DES 3 & DG/DES 3** basically the same breaches as under DES 1 but now more serious as policy DES 3 is explicitly intended to protect and enhance the City's Historic Environment; proposal includes idiosyncratic double height porticos, window bays projecting at right angles and poor choice of facing materials on rear elevation and for frames of entrance porticos as well as all the breaches listed under **DES 1** above

**DES 4** proposes complete removal of an existing landscape feature to be replaced with nothing of comparable landscape value

**RES 1** residential density double that of a traditional tenement in Woodlands

**RES 2** balconies overlook existing properties in Park Circus and Park Circus Place, bay windows in living rooms look straight at each other

**TRANS 4 & 5** access to underground car park requires long winding through routes, compromising residential amenity and pedestrian safety, undoing most of the benefit of controlled parking zone

**ENV 8** proposal would remove all trees from the site and replacement planting area limited to roof of underground car park

Our more detailed response to the application, and the associated documents submitted with it, is as follows:

### **Conservation Area status**

More than fifty years ago, and three years before the term 'conservation area' had any basis in statute, an enlightened Glasgow Corporation had recognised the Park Area as a Conservation and Improvement Area (*2002 PLI Report*, 4.9). The Park Conservation Area was then designated as such in 1969, recognised as outstanding for grant aid after 1972 and extended in 1990 to include Kelvingrove Park.

The City has some two dozen conservation areas and Park must be one of, if not the most significant and longest established of them. Glasgow City Council, as planning authority, is required by law to determine which parts of their area merit conservation area status. Having done so promptly for the Park area, the Council have since failed, for decades, to prepare any conservation area appraisal to properly inform development within this most prestigious conservation area. Only three other conservation areas in the City have been similarly neglected.

In the course of making FoI/EIR requests, local residents were initially told that there did not exist even a draft CAA for the Park Area. Appeals to the Scottish Information Commissioner then led to the release of more than one draft and some assurance was given to the Commissioner's staff that a draft would be published for consultation some time in January 2016. This has still not happened and no consultative draft CAA is yet available.

Against this background of persistent omission we are obliged to refer to, and attach in support, the *Conservation Appraisal of the Park Circus Study Area* prepared by MAST Architects for the Park and Woodlands Heritage Group, published in January 2016, and would commend it to the members of the Planning Applications Committee. The premature

determination of this application, before the planning authority has consulted upon and adopted an equally thorough conservation area appraisal dealing with, at least, the issues listed in the Executive Summary on pages 7 and 8 of this document, is regrettable. The lack of adopted area specific conservation guidelines risks impairing the ability of elected members on the Planning Applications Committee to thoroughly evaluate the effects of the proposal on the Conservation Area.

### **'Missing piece'**

Astonishingly, there is no mention whatever of the proposed development site in the latest available version of the Council's pre-consultative draft CAA, as released in December 2015. However, terms such as 'final missing piece' have been being applied to proposed development on this site for some time before appearing again in City Property's Marketing Brief published in September 2014. The 1851 'master plan', signed by Charles Wilson, a copy of which appears in the Heritage Statement submitted by the applicant, is for the layout of the West End Park. This 'master plan' did not propose any buildings on the application site.

The characterisation of the site as being a 'missing piece' of a 'master plan' by Charles Wilson is an assertion which does not appear to have been tested in any way. It is clear from the 1855 feuing plan and the 1856 elevation that, at that time, the City intended to build on the site according to plans drawn up by the Surveyor, Thomas Kyle. However for reasons explained in the attached *Conservation Appraisal of the Park Circus Study Area* (2.3, pages 22 & 23), the construction of Park Quadrant stopped advancing eastwards before 1857. Pleasure Gardens were then laid out and trees planted and Lynedoch Place was developed near the eastern extremity of the site.

It is doubtful whether building according to the 1856 elevation would have proceeded thereafter (*2002 PLI Report*, 7.45). Feus originally planned for Cliff Terrace and Cliff Crescent (unrealised streets between Park Quadrant and Woodlands Road) were also never developed, and Lynedoch Place was built to a different plan from the 1855 feuing plan.

Consequently, before the end of the 19th century, nobody was insisting upon completion of any of these superseded notions and Lynedoch Place had been designed and built to take advantage of an open outlook onto garden ground. The original plans were abandoned, not by Wilson, but by the promoter of the scheme, the (Incorporation of the) City of Glasgow. The sites of the unbuilt Cliff Terrace and Cliff Crescent feus have now acquired SSLI status. The former Pleasure Gardens at Park Quadrant should properly be afforded at least the same protection.

There is a long history of projects abandoned by the City of Glasgow, but would anyone really want to now revive, for example, those to widen Great Western Road into a six lane highway or to remove the statues from George Square? What is different about this one element of a plan abandoned 150 years ago and superseded by subsequent development? And what of Charles Wilson's earlier, 1851, 'master plan' which was to lay out ornamental gardens over the entire top and sides of Woodlands Hill?

It appears to us to make somewhat more sense to assess the situation as it is today without obsessive speculative reference to any particular unfinished 'master plan' with a 'missing piece'. For example, the significance of the existing garden ground at Park Quadrant should be properly assessed as recommended in the Executive Summary on pages 7 and 8 of the

attached *Conservation Appraisal of the Park Circus Study Area*, 2016 before any decision is taken which could lead to the removal of any more trees.

### **'Wonky roof'**

The terminology is not of our choosing but the proposed roof acquired this epithet almost as soon as the designs were displayed to the public in September last year. It represents accurately the immediate response of ordinary people to probably the most startlingly inappropriate element in the proposed design. Unlike the 'mansard' or 'Louvre' and deeply recessed dormer windows in, respectively, Park Terrace and Park Quadrant, the penthouse windows along the skyline are grouped irregularly and asymmetrically and each 'wonk' is also asymmetric in itself. This represents a breach of City Plan 2 Policy DES 3 in that it fails to "respect context, setting, local townscape" or "protect important public views of landmark buildings, vistas, landscape features and the skyline", and is not "sympathetic to local traditions". The drawing submitted entitled 'Proposed Elevation - Lynedoch Place' shows very clearly just how jarring the intrusion of the proposed roof is into the roofscape and skyline of the northern façade of the outer ring of the Park Circus area.

The problems associated with including such prominent penthouse features were considered in the 2002 PLI Report, the Reporter stating, at 7.22, "**I find** that the incidence of the penthouses is greater than that of the Louvre roofs and that the penthouses are a vertical upwards extension of the plane of the building line, whereas the Louvre roofs, allowing the dormer windows, rise from behind the parapet at eaves level in the form of a sloping mansard roof". The present proposal differs in that the penthouses are set back from the eaves and there is a frameless glass balustrade atop the eaves; in all other respects, the Reporter's observation stands. This 'wonky roof' has by far the most 'gap-toothed' effect on the skyline of any of the proposals for this site it has been this community council's misfortune to have to comment upon.

The continuous glass curtain walling of the front of the penthouses shown in the submitted elevations would also create a dominating broad horizontal emphasis which is at odds with the general verticality of both the existing Park Quadrant front elevations and the proposed ones from fifth floor downwards, and do so at a height which would make the position of the eaves appear lower on the façade of the building than the eaves of the existing Park Quadrant tenements. Existing eaves decoration in Park Quadrant is also much shallower and so far less prominent than this proposed feature.

The shallow pitch of the proposed roof and its comparatively lower ridge line accentuate the harm caused by these alien penthouse features to the setting of the adjacent Category A listed tenement to the west of the development site. The length of the development as it curves along Park Quadrant would further exaggerate the importance of the 'wonks'. From further into Woodlands, they would appear large enough to detract from the main elevation, given that the front elevation is on an elevated site which would be viewed upwards, compressing the apparent height of the building.

The Glasgow Urban Design Panel noted, at their Pre-Stage 2 Review meeting on 5 March 2015, that the "Ideas shown for a flamboyantly profiled penthouse roof contributing to the area's roofscape were to be welcomed [emphatically **not** a view we share when applied to the present proposal], but were very much work-in-progress and would need further refinement if a *schizophrenic* relationship to the stone façade below was to be avoided." (our underlining).

There has been little or no sign of any progress to avoid or even mitigate this 'schizophrenia' in the full year which has since passed.

### **Proposed straight projecting bay windows**

Amongst the architectural heritage aspects for which the Park area is renowned is its place in the early development of canted bay windows (*2002 PLI Report*, 4.4) and it is therefore quite extraordinarily out of place to be proposing bay windows which project normally from the front elevation. This represents a further breach of City Plan 2 Policy DES 3 and for the same reasons as already quoted above.

It also means that there will be pairs of windows only a few metres apart, certainly far closer than the usual minimum of 18 metres, facing each other directly between neighbours' living rooms in apparent breach of the privacy requirements of City Plan 2 Policy RES 2 "All homes should [...] have no adverse impact on existing or proposed neighbours, in terms of overlooking, loss of privacy, [...]"

### **Double height framed entrance porticos**

In section 3.5 of the Design and Access Statement, Elevation Analysis, these completely alien features are described thus: "double height framed entrance porticos reproduced". One wonders where they have been reproduced from as there are none in the area at present. Perhaps someone in the architect's office has misinterpreted the appearance of, admittedly elaborately decorated, existing double width porches (because serving two doors) in Park Quadrant at the tops of flying stairs over the basement light well, but these are not double height porches.

This is another breach of Policy DES 3 for the same reasons as before. To make matters worse, the material of the frames to these porticos is not even sandstone but "precast concrete panels - sandstone coloured", according to the legend on the submitted elevations. This would represent a breach of the 'Materials' section of the Marketing Brief as well as the Design Guide DG/DES 3.

### **Overshadowing to Lynedoch Place**

The 2002 Inquiry considered this aspect of an earlier proposal and the Reporter accepted (7.45) the contention of Historic Scotland (as then was) that Lynedoch Place would be reduced in apparent scale because of the proximity of the proposed development and also found that there was substance in the community council's submission that it would have been unlikely that the Quadrant would have been built to the full extent shown on the feuing plan had Lynedoch Place already been built. These findings are as relevant today to consideration of the present proposal.

The attached *Conservation Appraisal of the Park Circus Study Area* further identifies this as an issue to be reflected on and considered (pages 8 & 60) and also refers to the contribution of their open outlook onto garden ground as a major component in determining the successful development of the houses in Lynedoch Place (page 36, end of 3.6). The extent of the current proposal for residential development of the Park Quadrant site would therefore result in

detriment to both the setting of these B-listed buildings and views into the Conservation Area, in breach of City Plan 2 Policy DES 3.

### **Balconies on rear elevation**

The rear elevation to Park Circus Lane has a horizontal emphasis which is not typical of the architecture of the immediate area and this is made worse by the presence of these balconies. The few balconies there are in the area are decorative cast iron structures sitting on top of the mouldings above window openings to the floor beneath. They have but slight visual impact on the building's elevation. Those proposed for the rear elevation here are prominent. They are also something of an infringement of the privacy of existing residents in Park Circus Place and Park Circus who will be overlooked by them.

### **Transport**

The analyses of the effects of additional vehicle movements carried out in the submitted Transport Assessment are restricted to traffic flows at junctions on the periphery of the Conservation Area, conveniently ignoring the likely chaos which would result within. Coming from Charing Cross, in order to make their way to the proposed underground car park, vehicles will have to enter the area either up Lynedoch Street or up Woodlands Gate, turning into Lynedoch Place, thereafter through Park Circus Place, Park Circus itself and Park Gate (Woodlands Terrace affords another possible but less likely route), turning into the northern section of Park Terrace thence Park Quadrant. Entering off Eldon Street travelling east would necessitate an even longer route up Park Avenue, turning left into Park Drive, and up Cliff Road, along Park Quadrant away from the car park entrance before reaching Lynedoch Place and as before thereafter. Theoretically, entry could also be gained from Lynedoch Place into and along the entire length of Park Circus Lane, then into Park Gate, into the north end of Park Terrace and then Park Quadrant, but this could not be performed safely, given that the lane is so narrow and runs directly in front of the entrances to mews houses without so much as a pavement between the lane and the front doors.

The use of such long, circuitous routes by at least a hundred extra vehicles a day would wipe out at a stroke much of the pedestrian safety gained by the successful implementation of the Council's Controlled Parking Zone, which transformed the area when it was introduced, and will do nothing but harm to the area's "relatively pedestrian friendly environment and [...] attractive relaxed atmosphere" which is a consequence of the area not being "widely used as a through route" (*Conservation Appraisal of the Park Circus Study Area*, January 2016, foot of page 36). The number of extra vehicle movements is actually likely to be considerably greater than 100, given the circumstances of the targeted incoming owners ("high end homebuyers", "high class residential accommodation in a high demand area", etc., etc., according to City Property's Marketing Brief).

Far from facilitating or promoting walking and cycling, this much additional vehicular traffic on winding routes within the area would degrade pedestrians' and cyclists' experience of the area; at present families with young children may frequently be seen benefiting from local routes to and from Kelvingrove Park but will not be able to continue do this with as much safety. This would be in clear breach of the stated aim of City Plan 2 Policy TRANS 5.

## **Residential density**

In an appeal against refusal of planning permission for a mixed development in the adjoining Woodlands area, which consists almost entirely of traditional tenement dwellings, the Reporter elaborated on what City Plan 2 Policy RES 1 might reasonably mean in practice.

Reason 5 of the attached decision letter dated 7 September 2010 which dismissed the appeal (PPA-260-2013) states: "[...], were the site to be developed with matching tenements, assuming 2 per floor off a traditional close entry and shops across the frontage, only 18 units would result, producing a density of 91DPH. While there is clearly some scope on this site for the density to be higher than the upper base of 100DPH, at 249DPH, the proposal is nearly 2½ times greater. This would result in a substantial 7 storey development in close proximity to the traditional 4 storey tenements. Although I note that there is no upper limit in Inner Urban Areas under policy RES 1A(ii), I feel that such an intensification cannot be justified even in a high accessibility location."

The present Park Quadrant proposal involves the construction of 98 dwellinghouses on a site with a given area of 8180 square metres (or 0.818 hectares), according to the submitted application form. However, this figure for the area of the site is far larger than others given by, respectively, City Property's Marketing Brief (0.57ha) and the report by the Executive Director of DRS to the Council's Executive Committee (0.58ha reducing to 0.565ha [2.1 & 3.3 of the Report to the Council's Executive Committee on 4 February 2016 but 6240 sq.m. 'or thereby' on the accompanying plan]). The discrepancies between these figures are ludicrous, but we feel that, having been at the basis of negotiations of some legal and financial significance between the developer and the Council/City Property, the final figure of 0.565 hectares is probably the most accurate available measure of developable area. This would give rise to a residential density of 174 dwellings per hectare (DPH), or about double the residential density of a traditional tenement area and well in excess of the indicative upper base envisaged by Policy RES 1.

A density double the base figure indicated for a mere tenement area seems far in excess of what would be appropriate in an area of predominantly townhouses or very grand, one flat per floor, tenements. Existing properties in the Park Circus area are protected by a Local Area Policy under RES 5 against excessive subdivision ("a maximum of 2 dwellings in a 4-storey terraced property; and a maximum of 3 dwellings in a 5-storey, or more, terraced property").

To allow the residential density proposed would degrade the residential amenity, as well as the architectural integrity, of the area for incoming residents. The very character of the prestigious district they would be aspiring to buy into would have been damaged by packing them in so densely. While "high end homebuyers", as the Introduction to City Property's Marketing Brief put it, may indeed be that gullible, should the planning authority really be encouraging them in breach of policy and to the detriment of the entire "prestigious Park District" (*ibid.*) as well as the residential amenity of the new owners themselves? Put simply, they would not be getting the 'prestige' they are entitled to expect or being asked to pay for, and existing residents and visitors to the area, including tourists, would experience a reduction in the same 'prestige'.

### **Strain on Educational Services**

The school roll at Hillhead Primary School in nearby Kelvingrove Park, the only logical choice for incoming residents to the proposed development with young children, is already oversubscribed and attempts have been made to exclude the Park Area from its catchment. It is an excellent primary school and places there are highly sought after, but existing residents in the Park Circus area have had to fight to remain in its catchment area. This strain could only be exacerbated by building houses at such high residential density at Park Quadrant.

### **Not a 'brownfield' site**

The site has never been built on. The relevant strategic development plan is the *Glasgow and the Clyde Valley Strategic Development Plan* of May 2012. According to its Spatial Development Strategy, Spatial Framework 3, Sustainable Communities, we have at 4.64 "The city-region's future economic growth and its quality-of-life offer to its population require basic demands and needs, such as housing and shopping facilities to be easily accessible and of good quality. The SDS with its emphasis upon minimising the footprint of the built fabric of the city-region requires that these needs and demands be met in the most sustainably accessible locations. By their nature, these locations are predominantly brownfield, rather than greenfield." It follows that there ought to have been some assessment of overriding need for housing to be built on the 'greenfield' Park Quadrant site. No such assessment has been submitted with the application and the relevant Schedule 8 on page 44 of the Strategic Development Plan shows that there is no shortfall in Locally Targeted Demand for Housing in the private sector in Glasgow North and West for the entire plan period projected until 2020. In fact, the schedule shows a surplus of 3,400 units. To build unnecessary houses on this site consequently does nothing for the "quality-of-life offer" to existing and future populations of the area and would, for this and other reasons enumerated in this representation, devalue the offer.

On or after 14 March 2016, a 'Screening Opinion' appeared amongst the documents published online. The checklist attached to it describes the site, under 1 CHARACTERISTICS OF THE DEVELOPMENT (c), thus: "Brownfield site with overgrown landscaping". Brownfield Land is defined on page 66 of the Strategic Development Plan, in the Glossary, as "Land which has previously been developed". The site at Park Quadrant has never been built on. Further comment seems unnecessary.

From elsewhere in the same checklist ('2 LOCATION OF THE DEVELOPMENT (c) Absorption capacity of the natural environment') it would appear that DRS has managed to issue this screening opinion in complete ignorance of the SSLIs to the north of the site and the Designed Landscape of Kelvingrove Park. The opinion is also offered that "Kelvingrove Park is not considered to be of particular ecological interest", despite the checklist then going on to answer "Yes, Kelvingrove Park" in response to the question "Are there any areas on or around the location which are used by protected, important or sensitive species of flora or fauna e.g. for breeding, nesting, foraging, resting, overwintering, migration, which could be affected?" These last two statements are obviously incompatible.

### **Heritage statement on behalf of applicant**

The lack of a conservation area appraisal is noted at 2.3 despite the obviously considerable importance of the heritage assets in the Park area and their setting. The assets identified

include Kelvingrove Park in addition to a concentration of mostly A listed buildings. Figure 3.1 after paragraph 3.7 is a copy of Wilson's 1851 'master plan' for a public park but it should perhaps be made clear that this plan did not involve building any housing.

Paragraph 3.12 should have made clear that, while views within the area have changed very little and views outwards have obviously changed dramatically, views of the conservation area from outside have also remained remarkably unchanged.

In the absence of a conservation area appraisal which takes account of all of the issues raised for reflection and consideration on pages 7, 8, 59 and 60 of the attached *Conservation Appraisal of the Park Circus Study Area* prepared by MAST Architects for the Park and Woodlands Heritage Group, and published in January 2016, we would caution against attaching too much importance to the reasoning and conclusions of the rest of the applicant's Heritage Statement.

In particular, we would make the following contrary points:

The relationship of the existing Park Quadrant tenements with Kelvingrove Park does not confer on them quite the lack of presence referred to in paragraph 4.10. One only need walk on or near the slopes at the east end of the enclosed part of the Park, or cross the sloping grassy areas between Woodlands Road and Park Quadrant (which are also part of Kelvingrove Park) to appreciate this. Views from these same points also confirm the importance of the existing tree cover of the former Pleasure Gardens to the character of the conservation area and its relationship to Kelvingrove Park. Figure 4.2 is only one view from outside selected to illustrate one argument, while figure 4.10 conveys slightly more idea of how imposing the existing Park Quadrant tenements can be when viewed from within the Park (although this photograph is taken from just across the street; a view from the bottom of the slope within the Park would have better illustrated the dominance of the façade of the existing tenements).

At 4.15, and from 4.34 to 4.37, the rear elevations and roofscape of Park Quadrant from the north are downgraded compared to the views of the conservation area from the south and west. However, these comments take no account of the obvious importance in the landscape of the wooded part of the vista, particularly when their foliage is dense in summer. This oversight is corrected in the attached *Conservation Appraisal of the Park Circus Study Area*, at 3.13: "Mature tree planting dominates much of the conservation area and provides a sylvan setting to the whole, particularly when viewed from Kelvingrove Park and Woodlands Road." and "These trees have now matured to the extent that their stature, massing and line could be said to present a 'green' resolution to Wilson's original architectural design intent." and 4.2.6: "The landscaping has matured to the extent that it has become fully integrated into the overall architectural and townscape composition." The point is further illustrated by photographs on pages 24 and 48.

As for the positive contribution made by the rear elevations of Park Circus Place and Park Circus, it was noted in the course of the 2002 Public Inquiry that the Royal Fine Art Commission had referred to "the simplicity and elegance of the existing rear elevations" (5.33 and 7.47 of Inquiry Report, referring to RFAC case report 010308, March 2001).

4.47 assumes incorrectly that Kelvingrove Park stops at the railings leading down to the bottom of Cliff Road. The tree planted grass slopes between Park Quadrant and Woodlands

Road to the east of the Park railings are also part of the Park, and are designated Sites of Special Landscape Importance.

The section entitled Assessment of Impacts begins by quoting (at 5.1) somewhat selectively from Scottish Historic Environment Policy, which also states "The historic character of our environment is important to our quality of life and sense of identity. Many of its elements are precious, some are not well understood; if it is lost or damaged, it cannot be replaced. The historic environment requires careful and active management to ensure its survival." (*SHEP* 2011, 1.2) and emphasises:

**"The Historic Environment**

The context or setting in which specific historic features sit and the patterns of past use are part of our historic environment. The historical, artistic, literary, linguistic, and scenic associations of places and landscapes are some of the less tangible elements of the historic environment. These elements make a fundamental contribution to our sense of place and cultural identity."

We are quite certain that the Park Circus area falls into the category of being precious to the extent confirmed by, for example, the evidence of Professor Walker at the 2002 Public Local Inquiry (4.7 & 4.8). His evidence at 4.10 is unambiguous: "[...] the main issue was not whether the proposed building would be a good design in itself but whether it was appropriate to disturb the architectural integrity of an area of such outstanding United Kingdom importance with a building which would be so very different in scale, style and material." Of course, that was in relation to a different proposal but the current proposal is also different in scale (six storeys over an underground car park in an area of four storeys with attic and basement) and style (irregular, asymmetric and asymmetrically disposed penthouses as opposed to grouped symmetrical 'mansard' or 'Louvre' roofs and deeply recessed dormers as already described above, muddled reinterpretations of entrance features at double height instead of double width) and, while natural stone is proposed for most of the front elevation (apart from the entrance porches), 'sandstone rainscreen cladding system' is offered to the rear. Professor Walker wisely cautioned: " [...] While the completion of the Wilson concept might be thought desirable in principle, such a development was not desirable if the basic criteria of design and material could not be met. The situation at Park Quadrant was no different from Glenfinlas Street and Clarence Street in Edinburgh, where the original design had been completed in natural stone with elevations to match the adjoining buildings as originally planned. Although of a different period, the architecture of Park Circus, Park Terrace and Park Quadrant was not less important than that of Edinburgh New Town, and different standards should neither be applied nor accepted" (4.13). It is worth adding that the quoted examples in Edinburgh were for proportionately much smaller infill developments on far less prominent sites. At Park Quadrant, the proposed development would impose itself on about a quarter of the entire outward facing appearance of the whole Park Circus area.

We would respond as follows to paragraphs in the section of the Heritage Assessment entitled 'Impact on the Park Conservation Area' as follows:

5.7 While the 'master plan' may be fundamental to the special interest of the conservation area, it is by no means the only element which should be taken into account. Apart from anything else, earlier developments to the east predated its existence. Subsequent developments, in particular, the building of Lynedoch Place and the setting out of Pleasure Gardens on the application site, just as surely "make a fundamental contribution to our sense

of place and cultural identity" (*SHEP* 2011, highlighted panel after 1.2, quoted more fully above).

5.8 The positive contribution made by the rear elevations of Park Circus Place and Park Circus was noted in the course of the 2002 Public Inquiry, and has already been referred to above. The Pleasure Gardens were no less planned for being 'opportunistic', and have since contributed to the success of the Lynedoch Place buildings as subsequently realised. They may not have been planned as a 'public space' but were used for recreation by local schoolchildren from three different schools (*Conservation Appraisal of the Park Circus Study Area*, page 23) before being compulsorily purchased.

5.9 The claim that the proposal could enhance the conservation area seems absurd to us and the only justification given by the applicant's agent here is that the frontage would become 'active' and 'complete the streetscape'. It is simply not necessary for a frontage to be 'active' to contribute to the special character of a conservation area and we have already pointed out that the 'missing piece' argument for completion of the streetscape has not been tested and may be quite spurious.

5.10 While paired full height bays are characteristic of the area, bay windows projecting straight out from the front elevation are not. The introduction of this feature would represent an affront to the skill of those who, earlier than elsewhere in Scotland (*2002 PLI*, 4.4), developed and realised canted bays. This aspect of the proposal would certainly harm the character of the conservation area.

5.11 The failure to 'celebrate the principal entrances' properly in common with those in Park Quadrant has already been commented upon above under 'Double height framed entrance porticos.' These inappropriate features would also harm the conservation area. It is scarcely possible to compare the modelling and animation of the proposed roof form with those of its neighbours in Park Quadrant or Park Terrace without that proposed seeming very much at odds with the existing as explained in the 'Wonky roof' section above. Its prominence on the rooftop skyline would do considerable harm to views into the conservation area from the north.

5.12 Even the front elevation materials include fake stone framing the entrance porticos. The rear elevation has no true masonry, except for the wall to the lane, but a 'sandstone rainscreen cladding system' which may not perform very well in comparison.

5.14 The argument against this obsessive reference to a superseded 'master plan' and its so called 'missing piece' has been put exhaustively above and need not be repeated here.

And to the section entitled 'Impact on the Garden and Designed Landscape' as follows:

5.15 While the impact might be 'neutral' on the parts of the Kelvingrove Park from which the proposal could not be seen, the development would be highly visible from other parts of the Park to the north and west and the SSLIs to the east of the park railings. We would submit that the impact on these locations would be anything but 'neutral' and would do harm to both the landscape and to views of the conservation area from outside.

5.16 This proceeds on the misunderstanding that the Park ends at the railings. The assertion that the railings are a secondary boundary relative to the retaining wall and balustrades at

Park Terrace is laughable - this is a mere product of the sloping topography. The relevance of the 'master plan' has been questioned above at some length (section entitled 'Missing piece'). The Royal Fine Art Commission has commented on the existing positive contribution of the rear elevations of Park Circus Place and Park Circus, as already quoted above, so there is no need to screen these elevations. To do so with a proposed development which itself has elements harmful to the conservation area could not reasonably be said to enhance the character or appearance of the conservation area as claimed.

5.17 This could only be the case if the original palette of materials were far more strictly adhered to than indicated by the departures from it already noted (fake stone, rainscreen cladding, etc.).

5.18 The significance attached to the assertion that any views or vistas, from or into, the conservation area would be unaffected by the proposals or screened from them suggests that there must be something inherently wrong with the proposals that they require to be hidden in these views. We would reject the notion that views of the north side of the conservation area are somehow less important and can tolerate this intrusion into their skyline or their views of the conservation area from without, be the viewpoint near or far. The conservation area and the mature tree planting on Park Quadrant are highly visible from Woodlands Road and many places much further north in the City, such as Ruchill Park or the Forth and Clyde Canal towpath.

That being the case, and the special interest of the conservation area not being confined to the realisation of Charles Wilson's 'master plan' (see for example, the issues raised for reflection and consideration on pages 7, 8, 59 and 60 of the attached *Conservation Appraisal of the Park Circus Study Area* and the list of factors which contribute to the Historic Environment highlighted after 1.2 of *SHEP* 2011), the points made at 5.19 and 5.20 cannot reliably be sustained and the Conclusions from 6.1 to 6.6 are therefore not based on sound argument.

### **Design and Access Statement**

The applicant's observations are challenged under a number of policy headings in the 'Planning Context' section of their statement, while attempting to avoid lengthy repetition of our arguments already put forward above.

**DES 1** The breaches of policy under DES 3 noted above are also breaches of policy DES 1 in that the proposals do not:

"demonstrate [...] design which respects context, setting, local townscape and landscape character" - examples would be the 'wonky roof', which manages to breach under every head except landscape, and the effect on views from Kelvingrove Park

"relate well to existing settlements, infrastructure, local services, reinforce connectivity to the green network and safeguard the local historic and natural environment" - residential density far too high, through traffic introduced into successful CPZ, strain on school facilities, removes any connectivity to green network, destroys all trace of Pleasure Gardens

"protect important public views of landmark buildings, vistas, landscape features and the skyline" - spoils all vistas from north of site, removes healthy mature trees prominent in landscape, introduces absurd 'gap-toothed' skyline

"reflect [...] design [...] which is [...] sympathetic to local traditions, and which creates a strong sense of place". - no local tradition of roofs this irregularly styled, damages sense of place by harming architectural integrity and removing much valued view of mature trees

**DES 3** As already explained above, the proposals do not:  
"demonstrate the highest standards of urban design which respects context, setting, local townscape and landscape character" (see comments under DES 1)  
"relate well to existing settlements, infrastructure, local services, reinforce connectivity to the green network and safeguard the local historic and natural environment" (see under DES 1)  
"protect important public views of landmark buildings, vistas, landscape features and the skyline" (see under DES 1)  
"reflect high quality contemporary design, where appropriate, which is imaginative, innovative and sympathetic to local traditions, and which creates a strong sense of place" (see under DES 1)  
"use materials appropriate to the historic environment" (see under DES 1)  
"protect significant views into, and out of, the area" (see under DES 1)  
"retain all existing open space, whether public or private, which contributes positively to the historic character of the area" - would permanently remove open space of former Pleasure Gardens  
"retain trees which contribute positively to the historic character of the area." (see under DES 1)  
Almost every aspect of this policy is therefore breached.

**DES 4** The proposed development is required to, but does not:  
"respect the landscape character and amenity of the area and maintain local diversity and distinctiveness, including natural and built heritage and cultural features of landscape and biodiversity value such as designed landscapes, woodland, hedgerows, ponds, stone walls and historical sites" - the site of the former Pleasure Gardens was still being used recreationally until very recently by local residents and schoolchildren but would be permanently lost if this development proceeds  
"enhance landscape characteristics where they have been weakened and need improvement, and create new landscapes where there are few existing facilities" - the Council as owner of the land is solely responsible for the undoubted weakening and need of improvement of the site, the developer's new landscape proposals fall far short of replacing what would be lost  
"provide high quality landscape proposals that are integral to the overall development design." see immediately previous comment and we also doubt that trees planted on top of an underground car park will flourish for long  
To the weakening of the landscape characteristics being a direct consequence of the complete lack of maintenance of the site by the Council for the 35 years which have elapsed since they acquired it by compulsory purchase we would add that the site has nevertheless been in regular use by local residents and others since then. Not just *al fresco* drinkers either, but people walking their dogs or just wanting to enjoy peace and quiet. These uses only ceased within the last few weeks when all the missing railings which had allowed continued public access were replaced.

**RES 1** The proposal exceeds what was the Reporter's view at appeal of what would constitute acceptable residential density in a tenement area. This matter is dealt with more fully above (see 'Residential Density'). The proposed residential density does not merely exceed 100DPH but is 74% higher at 174DPH. For 98 dwelling houses, the lower figures of 120DPH and 168DPH given by the applicant cannot be reconciled with the site area according to City Property when the site was marketed (0.57ha) or DRS as reported to the Executive Committee after the footpath was removed (0.565ha).  $98 \div 0.565 = 174$  (rounded up, dwellings being indivisible) is the simple arithmetic. The relevant part of the conservation

area is not a traditional tenement area, not even in the existing Park Quadrant where there is only one flat per landing and the ground and top floors have respectively a basement and an attic storey in addition.

**RES 2** Breach of this policy has already been referred to above in our section 'Proposed straight projecting bay windows'.

**TRANS 4** The effect on pedestrian safety has already been commented upon in our section 'Transport'.

**TRANS 5** Our section 'Transport' is also relevant here.

**ENV 8** The aim of this policy is to protect trees, woodlands and hedgerows from inappropriate development. The policy itself states that: "Development should not cause the loss of, or serious damage to, trees, woodlands or hedgerows, which [...] are on Council owned land, are of significant ecological, recreational, historical, shelter or landscape value or are in a conservation area." Proposals should then demonstrate that "the public benefits at the local level clearly outweigh the value of the habitat" but no public benefit has been so demonstrated. Before the present planning application had even been submitted, healthy mature trees which were part of designed Pleasure Gardens were felled simply to enable site investigations to take place. The Council, as owners of the land, also own the trees and could, for that reason alone (without any recourse to the excuse of the ineffectiveness of the 'deemed TPO' status afforded to trees in conservation areas under current planning legislation), have refused permission for them to be felled. It is hard to avoid the conclusion that the Council have prejudged the planning application in the applicant's favour. We are unable to identify any public benefit whatsoever to offset the loss of trees which are of historic and recreational value as well as forming an important component of the character of the Park Conservation Area and featuring prominently in views of it from Woodlands Road and points further north. The applicant's landscaping proposals are hopelessly inadequate and come nowhere near to compensating for this loss.

Section 7 of the Design and Access Statement, the 'Visual Impact Assessment', confirms our worst fears that the gap-toothed profile of the proposed roof will dominate the skyline in views of the conservation area from the north. See, for example, the last photograph, labelled '7.11 View from Woodlands Road adjacent to Burnbank Bowling Club'.

Absent from both the Heritage Statement and the Design and Access Statement on behalf of the applicant is any reference to the significance of the strategic development plan, notwithstanding paragraph 138 of *Scottish Planning Policy 2014*: "Strategic development plans should protect and promote their significant historic environment assets. They should take account of the capacity of settlements and surrounding areas to accommodate development without damage to their historic significance." As far as we can determine, the *Glasgow and the Clyde Valley Strategic Development Plan 2012* fails to do this but we have referred to it above (section 'Not a brownfield site') to show that this site should preferably not be built upon at all as it is a 'greenfield' site which has never had buildings on it. The applicant has not demonstrated any overriding need for houses to be built on the site, which is hardly surprising as there is a projected oversupply of such housing in this part of Glasgow until at least 2020. Damage to the historic significance of the application site should not even be being considered in order to build houses which are not needed.

This is an unnecessary development as well as one that would, in our submission, cause harm to both the conservation area and the setting of the predominantly A-listed buildings within it. At present, only the building occupying the site of the former Park Church has a significant negative effect on the part of the conservation area containing the application site (*Conservation Appraisal of the Park Circus Study Area*, page 57) and fortunately it is not easily visible from outside except when looking straight up Lynedoch Street, although its height and visibility from afar are good examples of the detriment the roof height and roofline proposed at Park Quadrant would cause. This latest attempt to develop the Park Quadrant site for housing would add to that irreversible harm in a much more highly visible way to anyone looking towards the conservation area from the north.

We would refer to Professor Walker's statement in evidence to the 2002 Public Local Inquiry: "if the original design of Park Quadrant could not be acknowledged in the same material, then the 1857 decision which made this section of the Quadrant garden ground should stand." (*2002 PLI Report*, 4.13) and, by 'acknowledgement in the same material', he was referring to exact replication (*ibid.*, 4.16). A successful local example of near exact replication has recently been completed at the eastern corner of the junction of Lynedoch Street and Lynedoch Terrace. This particular conservation area, whether viewed from within or without, is far too important ("one of the finest residential developments of its type and date in the western world", *2002 PLI*, 4.7) to have lesser quality interventions thrust upon it.

Although we should not have to do so, we would finally make clear to our elected representatives on the Planning Applications Committee that the capital receipt to the Council in return for disposal of this site is no more a material consideration in planning terms than the potential adverse effect of the proposed building on the sale price of neighbouring properties. Even if that were not the case, the figure bandied about has to be put into context; it represents little more than a single day's expenditure from the Council's current annual budget. When Wilson's original 1851 'master plan' to build a park on top of the hill had been abandoned by the City to be replaced by the 1855 feuing plan for houses, the *Glasgow Reformers' Gazette* had this to say: "The proposed public park at Kelvingrove has turned, in consequence of a vote of the Council, into a mere building speculation by which private individuals may benefit immensely but at expense of public convenience" (our underlining; quoted at page 52 of the *Conservation Appraisal of the Park Circus Study Area*, MAST Architects, 2016). We therefore feel we have a duty to protect from mere speculation this finest of conservation areas in our community council's area for the unalloyed enjoyment and edification of both present and future residents as well as the visitors and tourists the Council quite rightly wish to attract in increasing numbers.

This application should be determined on planning grounds alone. It should be refused because the proposal is contrary to the development plan policies summarised immediately below (with selected examples) and there are no overriding material considerations that would outweigh the development plan policies.

**Scottish Historic Environment Policy 2011** (1.2) special interest of the conservation area not restricted to 'master plan' and 'missing piece'

**Scottish Planning Policy 2014** (138) and **Glasgow and Clyde Valley Strategic Development Plan 2012** (4.64) not a 'brownfield' site and projected surplus in this sector of housing supply

**City Plan 2 DES 1** bizarre roof and skyline, residential density too high, increased through traffic, spoils view of conservation area from north, removal of healthy mature trees, ...

**DES 3 & DG/DES 3** basically the same breaches as under DES 1 but now more serious as policy DES 3 is explicitly intended to protect and enhance the City's Historic Environment; proposal includes idiosyncratic double height porticos, window bays projecting at right angles and poor choice of facing materials on rear elevation and for frames of entrance porticos as well as all the breaches listed under **DES 1** above

**DES 4** proposes complete removal of an existing landscape feature to be replaced with nothing of comparable landscape value

**RES 1** residential density double that of a traditional tenement in Woodlands

**RES 2** balconies overlook existing properties in Park Circus and Park Circus Place, bay windows in living rooms look straight at each other

**TRANS 4 & 5** access to underground car park requires long winding through routes, compromising residential amenity and pedestrian safety, undoing most of the benefit of controlled parking zone

**ENV 8** proposal would remove all trees from the site and replacement planting area limited to roof of underground car park

Yours sincerely

Ruth Gillett  
(Chairperson)

attachments forming part of this representation: *Conservation Appraisal of the Park Circus Study Area* prepared by MAST Architects for the Park and Woodlands Heritage Group, January 2016; *Appeal decision letter PPA-260-2013*, 7 September 2010