



Woodlands and Park Community Council

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1 January 2007

Your ref: CONSULTATION TO COMMUNITY COUNCILS
GCC Application Ref: **06/03456/DC**

by e-mail to: <Planning.Representations@drs.glasgow.gov.uk>
cc: <Louise.Pasi@drs.glasgow.gov.uk>

**The 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 comprising 107 flats, off street car parking and associated landscaping

APP TYPE: Full Planning Permission

Thank you for your letter of 30 November 2006 and enclosures, in response to the request by Woodlands and Park Community Council for a detailed consultation on the above application. The application was discussed at the meeting of the Community Council on 13 December 2006, when it was agreed to make the following representation.

The decisions to use stone in the elevations, and to show a measure of respect for the plot widths deriving from the original feuing plan are to be commended. However, any contributions these might have made to the preservation or enhancement of the conservation area are largely negated by the introduction of features alien to the area that would significantly detract from its character.

Floor to ceiling heights

These are nowhere respected in the proposed design, not even in the front elevation. Far from the overall 'lining through' as required by City Plan Policy HER 3 (D) 3. (b), the only matching level is at the eaves.

Glazing to front elevation

The dominant pattern of glazing on façades in the conservation area is of windows aligned vertically with openings separated from one another horizontally by areas of masonry that include substantial mullions in bay windows. These strong vertical elements are repeated at regular horizontal intervals.

The glazing on the front elevation of the proposed development is subdivided only by thin metal glazing bars and lacks any rigid vertical emphasis. Particularly in oblique views, this creates the impression, even close up, of long unbroken windows which resemble a 1930s industrial development (see, for example, the illustrations on pages 18 and 19 of the Design Statement). From a distance, the impression of apparently continuous glass in over-size windows will be even more remarkably anomalous.

Vertically discontinuous bays

Even the highest window bay projections of the proposed development are not continuous to the eaves. None continue above the fifth floor and there are additional intermediate columns of bays terminating at second, third and fourth floors in a seemingly irregular pattern (“floor” here signifies a storey discernible on the front elevation). This would greatly diminish the vertical emphasis required to respect the character of the conservation area.

Top floor balcony

The lack of a typically strong perpendicular emphasis would be further emphasised when the proposed top floor balcony on the front elevation is seen, as it would be from any distance or from nearby Woodlands Road (see views on pages 16 and 17 of Design Statement). This dominant feature continues for almost the entire width of the front elevation, broken only by the terminating structure at the eastern end of the development. Long horizontal balconies are not a typical feature of the conservation area. In the limited local examples of balconies which exist on the other side of Park Circus hill, such as in Park Gardens, Claremont Terrace and Woodlands Terrace, they are interposed between stonework details whose own design is quite unaffected by the insertions.

Roof line

The ridge line of the roof of the proposed development continues at the same level without any stepping to take account of the topography of the site. The 1856 elevation shows a roof line stepped to follow the rise and fall of the ground level, as do all the existing roofs in the conservation area.

Ground line

Similarly, there is no stepping of levels where the proposed development meets the ground, unlike that characteristic of the conservation area and shown in the 1856 elevation.

Roof material

Bronze patinated copper is proposed. This is entirely uncharacteristic of the area, which is typified by slate roofing. City Plan Policy DES 3 4. contains a table of materials and their applications which clearly states both that metal roofing of any sort on residential buildings should be reserved for special features and that natural slate is the preferred material for

conservation areas where the dominant roofing material is slate.

Rear elevation

Notwithstanding the insertion of gigantic vertical grooves in the rear elevation which would themselves be visually oppressive and atypical of the area, the overwhelming impression is of otherwise unrelieved continuous balconies with unbroken horizontally aligned glazing, quite unlike the restrained appearance of the few existing balconies in the area (Park Gardens, Claremont Terrace, etc., as before). These completely alien features, while not visible from outside the area, would dominate the view of anyone passing along Park Circus Lane or looking northwards and westwards from windows in properties on the North side of Park Circus and Park Circus Lane, all in the conservation area.

Termination feature facing Lynedoch Place

This is admittedly a difficult part of the overall design to resolve, as the 1856 proposal did not have to contend with the proximity of existing buildings in Lynedoch Place. However, the pattern of the proposed glazing is even less successful here than it is on the elevation to the North and West. The addition of a chimney at roof level, while welcome, fails to compensate for the lack of substantial vertical emphasis in the glazing of the extremely large bay windows that are proposed. These would be highly visible from Lynedoch Place looking North and are sadly deficient in the mullions that characterise bay windows throughout the area. Again, the effect is reminiscent of an industrial development of the 1930s.

Trees

If this development proceeds, many mature trees would be lost and so their replacement is a matter that should be approached with considerable sensitivity. Neither in number of trees, nor as regards their species, does this appear to have been attempted. A total of eight specimens of ginkgo represents neither sufficient nor suitable tree cover.

Public Consultation

The public exhibition and meeting in May 2006 were much appreciated but the responses contained in the Design Statement to points raised at that time are less so.

The acceptance that Park Circus Lane should be fully cobbled once more (page 32) is to be commended but the reference to a "small setted detail" for drainage channels leaves in doubt the material from which this is to be formed. It should be of the same material as the rest of the lane surface. City Plan Policy HER 3 (D) 2. (a) refers.

The 9 to 12 metre height of the proposed new trees (page 33) does not make their relatively small number or inappropriate species any more acceptable (see also A&DS criticism).

The added chimney at the Lynedoch Place (not Street) gable is welcome but does nothing to ameliorate the appearance of the inappropriately glazed bay windows (see comments above under Termination Feature facing Lynedoch Place).

The primary reason given for using copper as a roofing material, a choice that was criticised at the public meeting, is that "the material can deal with the two different roof falls". To say this after explicitly having considered the possibility of slate is ridiculous. As already noted, natural slate is the dominant roofing material in the conservation area and part of its

character. Natural slate can be used without difficulty on a very wide range of angles of roof pitch, including angles both steeper and shallower than either of the proposed pitches, and it is so used throughout the conservation area. The use of copper as cladding for chimneys is equally inappropriate to the established character of the conservation area. It might be acceptable as a flashing material but, even there, it would be more appropriate to use lead as a detail.

The proposed erection of a statue of Charles Wilson in the garden at the eastern extremity was also criticised at the public meeting, but this has not been acknowledged or countered in any way in the Design Statement. We would be very concerned over the presumption that this development, as currently proposed, approaches anything like closely enough to the inspiration that drove Wilson's endeavours to merit the inclusion of such a statue. It does not by a considerable margin and we would therefore regard Charles Wilson's commemoration in this particular fashion as being in very poor taste indeed.

A&DS letter

It is commendable that the text of a letter from Architecture and Design Scotland is reproduced in the Design Statement, but we cannot accept the Architect's responses to the critical comments it contains.

There is unfortunately no response to the criticism by A&DS of the articulation of the front elevation in detailing and specification. The justification advanced by the Architect for not stepping the elevation, that to do so would be too "aggressive" or "assertive", cannot be taken seriously. All the elevations in the conservation area are stepped at roof and ground level, wherever required to accommodate to the shape of the ground and it has never been suggested that this is in any way inappropriate. The argument adduced by the Engineers that the presence of made-up ground indicates an intended build platform that did not conform to the natural topography is clearly contradicted by the 1856 elevation.

The criticism of relative lack of success in the treatment of the rear elevation is countered with the arguments that, firstly, because Charles Wilson's original proposal was a response to functional service requirements and generated a modest façade expressing each close, a modern idiom which serves to respond to function alone will suffice, and, secondly, the proposed balconies exploit the opportunity for sunlight. Entirely absent from both of these arguments is the need to take account of the character of the surrounding conservation area. We therefore find these explanations wholly unsatisfactory. We would also point out that the closing statement "In our own way we echo the Wilson pragmatism in what is a hidden court" seems, on the one hand, disingenuous for ascribing mere function as paramount in the nineteenth century design, which it certainly was not, and, on the other, dangerous because of the equally mistaken implication that a hidden court need take no account of its conservation area context.

The Architect's response to criticism by A&DS of the excessive formality of the rear gardens and contrived choice of tree species (bamboo/ginkgo) is peculiar. He first asserts that the rear 'deck' element is of a different typology to Wilson's informal treatment, the overall design having a "loose formality" deriving from the proposed subdivided gardens, but then goes on to state that the "series of 'garden' or human spaces" thereby created is consistent with the subdivided gardens of the original scheme. This appears to contradict the initial assertion, rendering the entire argument meaningless. The choice of trees is said to recognise the "particular opportunities and constraints of the elevated deck landscape", which would appear to be justification at least as much for dispensing with the latter rather than choosing

the former.

Conclusion of Design Statement

The text of pages 38 and 39 is alarmingly confused in its reasoning and possibly not worth detailed analysis. The general burden appears to be that to replicate Wilson's design would be parody, that we live so differently now that the internal layout of houses dictates a distinctly different design, even on the exterior, and this is said to be supported by a quotation from engineer Cecil Balmond. What Balmond has to say might have meant something in its (unattributed) context but communicates very little without it.

There is no reference whatsoever to the site's very large size or prominent elevated location in a conservation area of outstanding importance to the City of Glasgow, to Scotland and to Europe.

We reject altogether the argument that modern living requires housing so different in appearance that it cannot harmonise far better than this proposal does with the conservation area in which it finds itself. The proof of the contrary position lies in the very simple fact that people are already and increasingly keen to live in the existing 150-year-old houses, even in converted subdivisions of them, that comprise this ever more highly desirable residential area.

Breaches of Planning Policy

Some of the most serious breaches of City Plan Policies represented by the above criticisms are summarised below (references are to the CD-ROM edition of Part 2 of the City Plan made available with the Consultative Draft of City Plan 2):

The failure to line through floor to ceiling heights is in breach of City Plan Policy HER 3 (D) 3. (b), which states that "New buildings should match the height of adjoining property with floor and ceiling heights lining through"

The design shortcomings of the glazing to the front elevation, together with the vertically discontinuous window bays and top floor balcony are all in contravention of DES 1, Policies 1 ("should respect and reinforce local character and identity") and 2. (a) ("shall take account of, and reinforce ... the townscape characteristics and features of the surrounding area in terms of ... built form ..., scale and massing, elevation proportion and detailing, materials ..."), DES 2, Policies 1. (a) ("respond to its context") and 1. (b) ("reinforce or enhance the established ... urban ... character"), DES 3, Policies 2. (b) ("respect Glasgow's tradition of architectural modelling and ornamentation ...") and 3. (a) ("respect the character of the surrounding area and adjacent buildings in terms of building line, scale/massing, modelling, elevational proportion and materials."), Policy HER 1 (from "new development must respect its historic context in volume, scale, form, materials and quality as should proposals for development adjacent to, or affecting, the setting of a conservation area;" to "significant views into and out of conservation areas should be safeguarded;" inclusive), and HER 2, Policy 2. (viii) ("the design of new developments shall respect the character of the area or locality, particularly with regard to massing and materials").

The proposed roofing material is, as already indicated, in clear breach of Policy DES 3, 4. (see table thereat), as well as all other relevant policies which refer to building materials, *i.e.*: DES 1, 2. (a); DES 2, 1. (b) (i); DES 3, 2. (a), (c) & 3. (a); HER 1; HER 2, 2. (viii); & HER 3 (D) 3. (c).

The rear elevation as proposed and termination feature to Lynedoch Place offend against all the same policies that are disregarded by the front elevation, for similar, but not identical, reasons, as already detailed above.

Other material considerations

The foregoing departures from City Plan Policies also constitute automatic departures from the Structure Plan, with specific reference to Strategic Policy 9 B (iv) (2006 Draft Written Statement, page 79), for which no justification has been advanced in terms of Strategic Policy 10 of the latter.

This site is both exceptionally valuable in conservation planning terms and highly visible from outwith the conservation area because of its elevated position. The *Memorandum of Guidance on Listed Buildings and Conservation Areas* (Historic Scotland, 1998) suggests, at paragraph 4.39, that "the first priority should be to have regard to those special architectural and visual qualities which gave rise to the area's designation, thus any proposal which, either in itself or if repeated elsewhere within the area, could erode these qualities may have to be refused." According to National Planning Policy Guideline 18, paragraph 43, "Issues generally relevant to the consideration of all applications for listed building consent and applications for planning permission affecting listed buildings include: ... ; the building's setting and its contribution to the townscape or landscape, having particular regard to the impact of development upon the views to and from the listed building; the extent to which the proposed works would bring benefits to the community, in particular by contributing to the economic regeneration of the area or the enhancement of its environment (including other listed buildings)" and "There should be a presumption against development that adversely affects the character of a listed building or its setting." We would contend that the part of the quotation we have underlined applies at least as much to an outstanding conservation area consisting almost entirely of A-listed buildings as it does to an individual listed building, and this appears to be recognised by City Plan Policy HER 1: "significant views into and out of conservation areas should be safeguarded" (tenth bullet point under rubric "POLICY, WITHIN CONSERVATION AREAS"). The *Memorandum of Guidance* further suggests (paragraph 4.40) "that special regard should be paid to such matters as scale, bulk, height, materials, colour, vertical or horizontal emphasis and detailed design."

NPPG 18, paragraph 46, states very clearly that: "notwithstanding the acceptability of the proposals in terms of other planning issues, if any proposed development would conflict with the objective of preserving or enhancing the character or appearance of the designated area there should be a presumption against granting planning permission".

Conclusion

The proposed development would, in our submission, detract from the character of the conservation area for the reasons we have given above, whereas the Structure Plan requires this to be safeguarded and NPPG 18 requires its preservation or enhancement. Accordingly, unless all the breaches of policy identified can be cured by conditions attaching to any consent, planning permission for the proposed development in its present form should be refused.

We are disappointed that the only real progress in the four years since a Public Local Inquiry, which ought to have shed some useful light on the meaning of City Plan Policies in practice, would appear to be in the use of natural stone as a facing material. Any benefit that might

have resulted from the re-use of plot widths in the original feuing plan would sadly be restricted to the appearance of the proposed building in plan form and largely disguised in all elevational views by inappropriate scale/massing, modelling, elevational proportion or materials (the terminology of City Plan Policy DES 3. 3. (a)). We do begin to wonder whether it might not be time to recognise this site as a case of the type envisaged by the last sentence of City Plan Policy DES 3. 2. (a): "In exceptional cases of high conservation value traditional restoration or replication may be appropriate". Here, the conservation value could hardly be any higher, an 1856 elevation is readily available for reference and façade replication has already been carried out successfully in, for example, Alfred Terrace and, more recently, Great George Street.

The plans will be returned separately by hand.

Yours sincerely

A handwritten signature in blue ink that reads "Tom Johnstone". The signature is written in a cursive style with a large, stylized 'T' and 'J'.

Tom Johnstone
(Secretary)