TEMPLATE LETTER – SUBMIT YOUR OWN OBJECTION BY 12TH APRIL 2019

To: Planning Representations
Development and Regeneration Services
Glasgow City Council
45 John Street
G1 1JA

Email: planning.representations@drs.glasgow.gov.uk

Dear Sir/Madam,

**Planning Application: 19/00592/FUL**

**Application Site: 65-77 Otago Street, Glasgow**

**Proposal: Erection of Residential development (49 units) and associated works”.**

I object strongly to the above application on the following grounds:-

**1. Contrary to Place Making Principle of CDP1 (SG1)**

The developer wishes to build 4 flatted blocks up to 7 storeys high on a cobbled back lane with a mews building. This goes against the “overarching” Place Making Principle of CDP1 (SG1):

The scale and design of the proposed development is not in character with the current properties on Otago Lane. Currently Otago Lane comprises a small number of single storey mews buildings, and the development would comprise of a number of four to seven storey buildings of modern design, with roof terraces and balconies. This would materially change the usage and character of the area and is materially against the policies within the City Plan.

It is inappropriate to describe this proposal as an “Opportunity to develop the site in line with historical heritage” as this is a historic lane suitable for existing uses such as retail and workshop spaces. I object to the statement that “New development could consolidate and improve current location for all” when it will destroy the existing lane’s character. I disagree with the statement that “Architectural character of proposed blocks aims to fit with the existing tenement and warehouse architecture” as it is out of scale the historic nature of the site. Otago Lane is part of the Glasgow West Conservation Area, there is no historic precedence for 7 storey block buildings as proposed.

In addition, I object to the statement in Access and Design Statement Part 1 on page 17, which refers to historic context of the lane indicating that “historically larger scale buildings to the lane, then the limitation of storey heights to planning policy for lane conditions would be inappropriate.”

As the proposal lies within a Conservation Area, which is bounded to the east by the River Kelvin, the historic context is a key aspect to reflect in any plans. On the west side of Otago Street opposite the proposed development is the Georgian development, originally called Bloomfield Place built circa 1830, and including what were likely to have been Glasgow’s first ‘modern’ tenement flats. The nature of Otago Lane itself has an ad hoc mews character, originally built up opposite livery stables on the site of the proposed development. It has a much-valued character, which would be devastated by the proposed new flats. Of particular concern is Block A which is described in Access and Design Statement Part 3 at 4.6 with frontage and sit backs in line with the commercial properties and steps up to four storeys creating an end point to the lane. This is a visual intrusion which isdestroying an open space within the Green Corridor and creates a building that is not in the style of the neighhouring listed mews housing.

**2. This proposal contravenes CDP9 (SG9) which ensures protection of conservation areas**

The application will build on an historic site under section 2.16 of the City Plan which states;

“All proposals for new development in, or affecting the setting of Conservation Areas, must:
a) preserve and enhance the special character and appearance of the area and respect its historic context;
b) be of a high standard of design, respecting the local architectural and historic context and use materials appropriate to the historic environment;
c) protect significant views into, and out of, the area;
d) retain all existing open space, whether public or private, which contributes positively to the historic character of the area; and
e) retain trees which contribute positively to the historic character of the area.”

Otago Lane is part of the Glasgow West Conservation Area and there is no historic precedence for seven storey buildings at this locality.

The Access and Design Statement Part 3 describes at 4.1 that Otago Lane does “not fall into category of a back lane as it is wide and it has predominantly been inhabited.” This is an inaccurate description of this lane as it is highlighted in the Glasgow West Conservation Area Appraisal (page 14) as one of a limited number of “light industrial lanes” within Hillhead. Otago Lane is associated with services for local households such as dairies, workshops and commercial stabling. On page 55, it states “These lanes offer character contrast owing to their intimate scale, setted road surface and the incidence of polychrome and painted brickwork”, with photo 10 referring to light industrial buildings as being “reused for independent retail and restaurant in Otago Lane”.

Currently Otago Lane has just six flats and six commercial units. The scale, massing and density of the proposed residential development with 49 units is significantly out of proportion for the available area and is not suitable for a site with limited access via a single narrow lane opening.

**3. Contrary to CDP7 Natural Environment**

The proposal is outlined in Access and Design Statement Part 3 which describes Block B and D with frontages on to Otago Lane. Furthermore, at 4.8, it is stated that all flats in Block A, B and C have a private outdoor space in form of either a terrace area, projecting balcony, recessed balcony and roof terrace. Block D is comprised of one bedroom flats which have a Juliet type balcony in the living rooms. In addition, at 8.4 Typologies, there is reference to the two upper floors in Black B and C as having penthouse flats, many of which have roof terraces overlooking the River Kelvin. Also, at 8.8 Orientation, there is reference to Balconies which have been positioned on the north and east elevations to afford the best views. Additionally, at 8.10 the section of materiality, highlights that projecting balconies and roof terraces will activate the frontage along the river.

The development’s scale and massing with balconies and roof terraces is to the detriment of existing open space, namely the Green Corridor, and accordingly is not well designed or located and will make a negative impact on people currently living and working in the location as well as the environment. This goes against Open Space Strategy paragraph 3.7 and PAN 65.

As detailed on Page 12, Access and Design Statement Part 1, “Eastern edge of the site along the River kelvin designated as city-wide site of importance for Nature Conservation and is in the River Kelvin Green Corridor, site also in SEPA defined flood area.”

The development, which proposes the removal of trees and the building of 7 storey blocks, will not enhance the character or qualities of the site and will have an adverse impact on the special character or qualities of a local landscape and so therefore the Council must not support this development according to CDP7 Natural Environment (SG7 par. 7.3).

In the proposal’s ecology assessment, section 5.1 Habitats, it is highlighted that lighting has to be directed into the site and away from green corridor / riparian edges. Lighting design has to be selected to create the minimal lighting spill possible. At 5.3, there is reference to preventing contamination of the river including littering. It is vital that any proposal seeks to minimise lighting on bats, birds and mammal species using the riparian / green corridor. This proposal has new buildings flats in Block A, B and D with balconies in the living rooms and roof terraces overlooking the River Kelvin. Also, at 8.8 Orientation, there is reference to Balconies which have been positioned on the north and east elevations to afford the best views. Additionally, at 8.10 the section of materiality, highlights that projecting balconies and roof terraces will activate the frontage along the river. The installation of lighting at the four blocks of flats will create light pollute on this section of the green corridor and with light spilling from the frontages on to the riverbank.

Species Protection Plan is not available for the proposal to preserve bats and otters who make movements across the site, to protect them from injury and to maintain access to adjacent habitats. This proposal goes against the principles of CDP7 as the design and layout will not enhance this area of wildlife corridor and its use as a wildlife habitat.

**4. Contrary to CDP 11 Sustainable Transport**

In the Access and Design Statement Part 2, it is indicated that there is an “opportunity to lift and relay the setts to adoptable standard” when Otago Lane is already adopted by the Council. There is concern that unnecessary works on the existing setts are proposed and this could damage the current integrity the lane’s adopted roadway.

At Access and Design Statement Part 3, it states at 4.11, there is a plan for 1 cycle storage space per unit, creating 49 spaces. However, this is inadequate cycle storage facilities for residents who want to prevent theft of their bicycle.

**5. Increased risk of flooding**

There is more hard standing created by this proposal and as a consequence, there is an increased flood risk.  The Strategic Development Plan (SDP, Climate Change Adaptation, fig. 4) states that in order to counteract the effect of climate change, vacant and derelict land gap sites be made into “ permanent green space”. Futhermore it states that the “Green Network can play a role in off-setting the effects of overheating and in improving air quality however the greatest adaption potential is in reducing surface water flooding.” The removal of trees and vegetation (already commenced in advance of the granting of 19/00592/FUL) and the location of large urban blocks next to an important waterway (River Kelvin) is unacceptable according to legislation in CDP6, 7 and 8 as supported by the SDP.

**6. Lack of sunlight to flats on Otago Lane**

The proposal shows that Annual probable sunlight results on Otago Lane are not adequate, with WO1 minor fail; WO9 moderate fail and W10 minor fail. Because of its height, scale and proximity, the proposed development would substantially overshadow the neighbouring properties and significantly reduce the sunlight available. The height and number of the proposed buildings will result in the current flats and shops in Otago Lane being entirely encircled and overshadowed.

**7. Contrary to SG4 as threat to local shopping facilities**

This business community in Otago Lane dates from the early 1800’s, with an open aspect and having a bohemian ‘West End’ feel and character. The development does not take proper account of the existing long standing “sustainable” businesses of Otago Lane and their interests, putting at risk their ability to trade and hence and 30 jobs. This is contrary to of SG4, 2.14 (Ass.G 8) which supports the “protection of existing local shopping facilities”.

In my opinion this application must not be granted because …………………..

[Include your own comments here]

Please consider my objections when assessing this application.

Yours sincerely

[YOUR NAME]
[YOUR ADDRESS]
[YOUR ADDRESS]
[YOUR ADDRESS]

[DATE]