

Dear Sir/ Madam

17/02059/DC | Erection of residential development with office (Class 4) and commercial uses (Class 1, 2 and 3) and associated parking and landscaping. | Site Formerly Known As Victoria Infirmary 517 Langside Road Glasgow

I am the chair of Mount Florida Community Council and a member of the Victoria Forum a coalition of community councils campaigning for community input to the development masterplan for the Victoria Infirmary. I have been following story of the Victoria Infirmary for several years.

I object to the above planning application. I am not against redevelopment of the site for housing and commercial purposes in principle. However the proposal does not accord with the City Development Plan.

My main concern is that for a site of such importance there should be in place a clear and consistent framework (a masterplan) against which planning applications can then be evaluated. This is the council's own policy, as set out in the City Development Plan. Such a framework should be based on socio-economic analysis and community input. Since there is no approved masterplan it is impossible for the pros and cons of the application to be assessed. Without a masterplan in place, it is likely that opportunities to realise the intent of the Development Plan are being missed.

It has been made even harder for the community to evaluate the proposal by the absurdly complicated application – nearly 400 complex technical documents only accessible online or in City Chambers.

I give my objections in more detail below. I would like the planning committee to reject the application, or somehow put it on hold for a period of 2 or 3 months, then commit the necessary council resources for an intensive master-planning exercise in order to address the issues identified by the Victoria Forum's own Community Masterplan, which were:

- **Housing** needs of the area: identify the required unit sizes, types and tenures.
- **Transport** needs of the area: parking, pedestrian access, cycle routes, public transport
- **Community amenities:** school capacities and catchment areas, children's safe play space, indoor community meeting spaces, communal gardens.
- **Local economy:** appreciation of the types of complementary commercial property required and protection of the minor town centre (CDP4).

The planning application is premature in the absence of an approved masterplan

It was a positive step when pressure applied by local community councils forced GCC Planners to change their approach, enforcing the City Development Plan requirement of a masterplan for the re-development. The previous and currently adopted City Development Plans clearly specify that this is a masterplan site.

According to Scottish Government advice Planning Advice Note 83 (my emphasis): "A masterplan comprises three dimensional images and text describing how an area will be developed. [...] Most commonly, it is a plan that describes and maps an overall development concept, including present and future land use, urban design and landscaping, built form, infrastructure, circulation and service provision. It is [...] intended to provide a structured approach to creating a clear and consistent framework for development. [...] A masterplan is [...] linked to social and economic analysis and a delivery strategy."

A “clear and consistent framework for development” of the kind described by PAN83, is critical to successful planning and development in Langside. The Victoria Infirmary site is large and complex, it has historical significance, and is situated in a densely populated area that already experiences serious problems with traffic and parking. Local businesses are another important consideration. The redevelopment must also be considered in the context of the high rate of house-building in the area, with 856 homes planned or proposed. My concern is not the house-building itself but that there must be careful planning for the expanded population.

Planned or proposed housing in the area:

- 413 homes at former Victoria Infirmary
- 154 homes at the former Scottish Power carpark
- 125 homes at the former Scottish Power office
- 101 homes at the former Mansionhouse Unit
- 47 homes at the former Holmlea Primary school
- 16 homes on Sinclair Drive

No masterplan has been approved for the site and therefore the planning application is premature and permission should be refused.

The planning application does not constitute a masterplan

The applicant has taken the approach of integrating the masterplan throughout the more than 380 documents that constitute the planning application. The applicant admits in their planning statement that this approach is “somewhat unique”. This integrated detailed-application-as-masterplan is not suitable to the complex context described above for the following reasons.

The most critical problem is that the application-masterplan is limited to the site boundary. The masterplan should make clear how the whole area should be developed. In particular the masterplan should provide a development framework for the following critical issues that were identified in the Victoria Forum’s public community master-planning event:

- **Housing** needs of the area: unit size, type and tenure.
- **Transport** needs of the area: parking, pedestrian access, cycle routes, public transport
- **Community amenities:** school capacities and catchment areas, children’s play area, indoor community meeting spaces, communal gardens.
- **Local economy:** appreciation of the types of complementary commercial property required.

There is no “clear and consistent framework”. There are only detailed plans spread across almost 400 online files that are extremely difficult for the lay person in the community to engage with.

The application is not “linked to social and economic analysis”. For example it is not explained why its chosen mix of unit sizes is appropriate to the area, relevant to CDP10 (Meeting Housing Needs). It does not explain how the commercial units will impact the existing Battlefield Town Centre which is protected under CDP4 (Network of Town Centres).

There was no “structured approach” to its development. Instead the consultation took the form of a standard pre-planning application process and was a carefully stage-managed presentation of the developer’s original detailed plan.

The three dimensional images are insufficient to understand the relationship between the proposed development and the surrounding area. For example, I cannot find a 3D representation that clearly shows the size of and proximity of proposed buildings in relation to the Battlefield Rest. This is an important consideration in relation to CDP9 (Historic Environment).

Other objections

The proposed development is built too close to the road edge and precludes the possibility of proposed public realm improvements currently under consideration by the Battlefield Working Group (Chair: Cllr Archie Graham). Such improvements would improve pedestrian and cycle circulation.

The proposed development is too close to the Battlefield Rest and will change the character of this valuable historic building.

There are insufficient 3- and 4-bedroom units in the development. Many growing families are obliged to leave the area for lack of suitable housing. 1- and 2- bedroom units are more profitable, but for the long term strength of the community larger flats are needed.

It is not acceptable for such a large site to have no play area for children.

The drawing of the Café, listed in the index of drawings is not to be found in the application.

There has been insufficient time to consider a fuller response to the application. There are nearly 400 complex documents in the application. It was published immediately prior to the October meeting of Battlefield Community Council, making a considered response by the community council impossible. Planners have refused to extend the period in which comments would be considered for the recommendation to the planning committee, offering only to forward late comments to the developer.

Yours faithfully

Chris Carus
Chair of Mount Florida Community Council
Member of Victoria Forum