



**The Lennox Heritage Society  
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Chairman : Jeremy Watson  
5<sup>th</sup> September 2021

## **PLANNING APPLICATION DC21/211/FUL Residential Development Site On Land Surrounding Craigend House Cardross Road Dumbarton**

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### **SUPPORTING DOCUMENTATION TO THE OBJECTION BY THE LENNOX HERITAGE SOCIETY**

The Lennox Heritage Society has as its mission, the promotion and protection of the history and heritage in all its facets within a wide sector of West Dunbartonshire. It draws its membership from across an area stretching from Loch Lomond to Bowling.

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We have perused this application, visited the site and discussed this application with other concerned people. The following explains our objection and provides supporting evidence in conjunction with our covering letter and online objection.

We note that development proposals for this site have been made several times over the years. This current application now includes proposals for SuDS and these give us great concern. We are not against development as such on the site; only the manner in which it can affect the historical and natural features. Of particular note are implications for the Convent of Notre Dame Chapel and Havoc Hole / Wallace's Cave together with the cliff face.

The proposals include severe interventions on the sea cliff and destruction of the cave, together forming the common boundary between the development site and Havock Meadow, which is community amenity area, in other words a neighbouring / adjacent public held site.

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## **CONVENT OF NOTRE DAME CHAPEL, Havoc Road, Bruce Hill, Dumbarton.**

Other than Craighend House, a Carmelite Monastery, nearby, this is all that remains of the greater development associated with Notre Dame school.

Buildings at Risk Register for Scotland reference 4891.

Canmore ID 196749. This gives a comprehensive description which is elaborated on further by WOSAS : WoSAS Pin: 40184.

This also appears as Historic Environment Record 40184

EXPLORE WEST DUNBARTONSHIRE website : [Explore West Dunbartonshire | CONVENT OF NOTRE DAME, HAVOC ROAD, DUMBARTON \(spanglefish.com\)](https://www.explorewestdunbartonshire.co.uk/CONVENT-OF-NOTRE-DAME-HAVOC-ROAD-DUMBARTON)

The building is not listed, but is known for some fine carved detailing above the south doorway and on the pilasters internally. (Stained glass windows and other internal features have since succumbed).

It is noted that one of the proposed drawings in the application is for the building to be adapted as residential, but this appears to be considered just as an option. This Society wishes to see this building retained and sees no justification within this application for its removal, but would not object if it were to be lost. If this were the case, and keeping in mind the descriptions by Canmore and WOSAS, every effort needs to be made to recover the surviving special features. These could be incorporated into the new development so retaining historic reference.

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## **HAVOC HOLE and the sea cliff edging the raised beach below Brucehill, adjacent Havoc Road, Dumbarton.**

EXPLORE WEST DUNBARTONSHIRE website : [Explore West Dunbartonshire | HAVOC HOLE, HAVOC ROAD, DUMBARTON \(spanglefish.com\)](https://www.explorewestdunbartonshire.co.uk/HAVOC-HOLE-HAVOC-ROAD-DUMBARTON)

FRIENDS OF HAVOC MEADOWS : [Friends of Havoc Meadows - Home | Facebook](https://www.facebook.com/friendsofhavocmeadows/)

GEOGRAPH.ORG : <https://www.geograph.org.uk/photo/1054823>

GEOLOGY GLASGOW website : <https://geologyglasgow.org.uk/sites/havoc-hole/#:~:text=Havoc%20Hole%20is%20a%20small%20but%20very%20interesting,Ardmore%20Point%20which%20is%20just%20north%20of%20Cardross>. Follow their link to an interesting article.

WALKABOUT website : [Havoc Meadows | Woodlands | West Dunbartonshire \(wdwalkabout.com\)](https://www.wdwalkabout.com/Havoc-Meadows-Woodlands-West-Dunbartonshire)

Havoc Hole and the sea cliff need to be seen together in context. While the sea cliff extends westwards to the edge of Cardross, it varies greatly in consistency and form. This section from the bottom of Havoc Road through to near Kirktonhill continues roughly in the same form and height. Of this, the section within which is the historic cave is the most

impressive and picturesque. It may not be very high, but defines the edge between the hill and the raised beach floodplain. The former being residential. The latter being recreational and wild area. The cave may be little more than a fissure, but it has great local significance.

## GEOLOGY

Havoc Hole and the sea cliff are of geological interest. We are very fortunate to have this within a natural area that we use for recreation right here within Dumbarton. Havoc Hole is the most significant feature being a remnant of a fossil sea cave which can be found in the raised beach cliff. The red sandstone of which the cliffs are made dates from the Upper Red Sandstone of the Devonian Period, approximately 375 – 360 million years ago, and would have been deposited at a time when the area we know as the British Isles was part of a large continent. (See geology link above). This should not be seen simply as of specialist interest, but something of intrinsic value to the community in terms of education at different levels and should be considered integral to the future of Havoc Meadow.

The sandstone cliffs were a shore line at the end of the last ice age, about 12,000 years ago. The sea would have worn away at the sandstone and the pressure of water would have resulted in cracks appearing in the rocks. These cracks eventually widened into caves.

*Craigend* is to be found as a place name at both ends of this stretch of cliff and are indicative of its local relevance.

These are not just values identified by this writer or the Lennox Heritage Society that he represents. The current **Local Development Plan 2** (LDP2) indicates this as being designated as ENV1 Local Nature Conservation Sites (Geological) and this sits adjacent to GI1 Open Space and ENV1 Local Nature Conservation Sites (Biological). All planning applications have to satisfy the Local Development Plan. The symbol for ENV1 Local Nature Conservation Sites (Geological) in this case sits astride the building site boundary and thus illustrates that the particular characteristics of value must be protected both within and adjacent to the site. [It is noted that while LDP2 is still in the process of final adoption, it is for this purpose considered to be the current Local Development Plan and the one relevant to the proposed planning application. It has already been approved by the council's Planning Committee].

## NATURAL AMENITY

The open area below the sea cliff incorporates playing fields to the west of Havoc Road and a natural area known as Havoc Meadow immediately adjacent to it. This is managed wild meadow with minimal seasonal maintenance that allows human visitors and use while encouraging wildflowers, insects, birds and mammals. As a mosaic habitat it has exceptional biodiversity right on the edge of Dumbarton. It attracts wildlife and is generally well used by the public. In reality the whole area is Havoc Meadows and should be seen holistically as comprising various complementary components all bound by the shore of the Clyde itself to the south and tree lined sea cliff to the north.

The birdlife that sweeps in as the tides recede is well acknowledged as amazing. That is not directly affected by the planning proposals, but other aspects are. The trees that are situated immediately above the sea cliff are varied and mature and of great aesthetic value. Some of those manage to cling to the very cliff edge and are quite amazing. It is imperative that a thorough tree assessment is done. We note the inclusion of a Tree Survey in the supplementary documentation and reference that all those identified in the Tree Preservation Order will be retained. The diagrams for the SuDS appear to compromise that.

There are many local people who simply love Havoc Meadows for its wildness. A look at the Friends of Havoc Meadows FaceBook page shows a record of an extraordinary range of birds and bugs, several of which are not common elsewhere in the area. Bats certainly roost in some trees and rock face even if not in the cave itself. We note that a Preliminary Ecological Appraisal has been done. This is appreciated, but it should also be noted that the lack of rare species must not detract from the value and importance of the more common ones.

The connectivity between the site and the core path is accepted in principle, but this must not damage the very characteristics that make the shore, the sea cliff and the immediate area above the sea cliff so attractive.

It is of note to see the knoll, in the planning documentation simply referred to as a "mound", appear on the map of 1837. It is very obviously a scenic viewpoint complete with path and steps; a place to view the passing ships and the wildlife and for contemplation. This is what the planning proposals indicated as being intended for destruction. The rest of the site may well currently be derelict, almost all buildings long since demolished, but here is a great potential benefit for the new residents. It is a place now surrounded by trees. We cannot fathom why there would be any intention for its removal.

As noted under the subject of GEOLOGY above, the current **Local Development Plan 2** (LDP2) indicates the southern boundary of the proposed development site is designated as ENV1 Local Nature Conservation Sites (Geological) and this sits adjacent to GI1 Open Space with ENV1 Local Nature Conservation Sites (Biological) close by. All planning applications have to satisfy the Local Development Plan, in this case in the interface between the proposed development and the open space and natural areas onto which it faces.

## COMMUNITY LORE AND HISTORIC CONTEXT

WOSAS have already indicated that there are strong historical connotations for this site. It is necessary to provide a professional archaeological assessment of the site. Prior to the nunnery, the site was occupied by the Clarkhill estate and large house. The archaeological assessment must include any natural features with historical and therefore archaeological connection.

It must be recognised that local community association with the site and adjoining natural features include local legend. Lack of archaeological finds as such must not diminish the importance to the community. Having said that, we note below both known and suspected historical associations as well as some underappreciated markings.

The point at which local legend meets proven historic record for Havoc Hole can be obscure, but that makes it no less important. The very fact that this small cave is also known as Bruce's Cave or is associated with William Wallace is indicative of rich tradition.

It is a fact that Robert the Bruce settled at "Cardross", at that time being a vast area inclusive of this coastline and we can safely presume that he visited the cave. It would have been expedient to assess this coast in terms of defensibility; the cliff edge being a barrier to some degree; the small cave being a place to hide, possibly for supplies. He appears to have finally settled near Renton on the shores of the River Leven, but this area was effectively his estate and this is reflected in the nearby names (with some subsequent added interpretation) of Brucehill and Castlehill. While current opinion now favours Bruce's manor as having been on the Leven, WOSAS note the appearance of an enclosure and ruins on old maps that appear to have been a hunting lodge in the immediate vicinity of this site. While a little further east and now under housing, this substantiates the community memory and lore of grand premises that could have been somehow linked to Bruce. Even if that link is wishful thinking it means that at least a watching brief needs to be given to a professional archaeologist.

It is purported that William Wallace sought refuge in this cave. This may not be accurate, but fits in with his one time intention of attacking Dumbarton Castle. He went on to attack Rosneath Castle instead and may well have lingered here before following the coastline westwards. We know he was pursued and such features could have provided at least some temporary seclusion.

Local historian I.M.M. MacPhail appears to quote Blind Harry with the often repeated words: "in at the flows of Havock, and out at the yetts of Carman". While this may include much wishful thinking then and now with superstition melded in, it certainly raises many questions. The identity of Havock is clear. It is this place and the allusion to an *in point* that certainly aligns with this cave (or something similar).

Dumbarton had its fair share of suppositions and accusations of witchcraft so often connected to the underworld. As author Joseph Irving alluded to, this may well have included *anyone* not following the mainstream religion of the time. Superstition with pagan origins and Christianity were often practised in parallel – just in case. It is known that those suspected of witchcraft met in places like this and that at one time ostracised Catholics from Dumbarton would also seek out such places for some degree of protection. The stone of the cave is fairly soft and susceptible to erosion, but a local investigator notes that *Havoc hole has a cross and several inscriptions at the entrance and higher up (if you climb) going back nearly 150 years.* (AMcC). Circles have also been noted carved into the rock, although these may not be of the same origins as the famous cup-and-ring marks elsewhere in the area.

The small cave is unlikely to have been occupied for any length of time, but it is sufficiently large to have been used by people through the ages as a temporary shelter; a place to hide in. If we go back even earlier than the aforementioned events, we can compare it to similar caves in such sea cliffs elsewhere in the region. That at Portkil, for instance, has been shown to have been used in the Bronze Age. Havoc Hole shows signs of disturbance through time with debris accumulating on the floor – material fallen from the walls, remains of fires, imported litter. Yet this may conceal a larger depression that could have been

more useful to past generations. Perhaps this even conceals a tunnel.

This area is not covered by the nearby Conservation Area of Kirktonhill nor is it within the Heritage Trails published by the West Dunbartonshire Council, but it is nevertheless worthy of much more attention. It is an important natural feature with Havoc Hole being of great historic and community significance and the Lennox Heritage Society is one of the local bodies which wishes to see it become part of a greater history and heritage trail framework. To this end it needs to be better signposted and given **Local Heritage Status**. Local Heritage Status is well established in some parts of the UK. It is defined as a heritage asset such as a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Such features are not necessarily covered by other statutory protection. There are several features in West Dunbartonshire that would fall into this category and Havoc Hole is a prime example.

## ANY BASIS FOR THE LEGEND OF A TUNNEL UP FROM THIS CAVE?

Local lore records that a tunnel led from Havoc Hole up (or down depending on your view) to the higher ground and perhaps even up the hill. There are two “modern” considerations that may substantiate that.

One is that several of the older buildings, so many now gone, have or had subterranean areas comprising basements or solums and some of these appear to be what local people refer to as “dungeons”. This latter interpretation may simply be a wishful perception. What is relevant is that such properties, at least the larger ones, had to deal with their own drainage. The obvious route was to the Clyde and any natural features could be optimised. If a fissure in the rock face was available, what better way to lead a pipe than connect it with minimal excavation through to it. Havoc Hole is today extensively in-filled with debris, both natural and man-made. We simply do not know if this was the case here. And if it was excavated to link drainage from above, it may well have appeared to substantiate the legend of a tunnel.

The other is the reputed existence of a small tunnel roughly in line with this location discovered when the railway cutting and tunnel was done.

All this proves, if nothing else, that the local lore of a tunnel from Havoc Hole is important to community memory, in other words *intangible heritage*. Any disturbance and damage to Havoc Hole and the sea cliff here would destroy potential evidence and the long held associations.

## SITE DRAINAGE

This is the crux of all the concerns in this objection.

Although the site at one time was extensively occupied with buildings, it is envisaged that the proposed new development will imply greater provision to meet current standards. Of this, it is the design for surface run-off that is most crucial to the future of Havoc Hole and Meadow. There is no question that much of that run-off will eventually lead to the Clyde.

The question is how?

We can expect two components : immediate surface run-off and that temporarily stored to attenuate the impact during heavy rains on the areas immediately lower down. With the site being bound by the railway cutting and tunnel to the north, the Clyde to the south, Havoc Road cutting through and down to the west and Brucehill to the east. This layout forms a horseshoe shaped site with Craigend House within the remaining space. Any drainage has to deal with the dual areas closest to the Clyde and this is influenced by the topography. Note that the SuDS as currently shown will not protect the proposed new housing itself and this influences reactions to the considerations of its form, scale and location. Official policy requires that all new developments should collect, treat and ideally re-use storm water where it falls. There is no prescription as how that is done, but the general principle is that it protect adjoining sites from accumulated run-off and ideally other parts of the new development too.

We have noted above that the derelict chapel is not of concern. However around it are magnificent trees and the undulations in the topography together with the trees make it very attractive. That also provides an existing, fairly natural, depression that could be utilised for a draw off point for surface drainage. Notably, it does not offer this facility for the eastern end of the site, except in a circuitous manner. This western edge is also above Havoc Road which currently takes a battering from excessive run-off during heavy rains. The SuDS as proposed will benefit this road, although this does not explain the design choice, scale and form.

The current proposals indicate this as a fairly large SuDS catchment point. And this in turn would destroy or at least substantially damage all that we note above as being of value. The consideration of this end of the site is certainly obvious in terms of fall as depicted in the Slope Analysis. The question that is not covered is why this needs to be here in relation to what is to be protected from excessive run-off and why attenuation of excessive run-off needs to be in this form and scale.

We also note that the current apparent preference for the SuDS in the south west corner of the site is but one of three options, at least one of which provides a solution that would not damage all that we identify as of value in this area. This is Option 2 – Figure 18. While this may not have the ease of application of Options 1 and 3, it avoids all the other implications. And it could better serve the proposed housing areas.

We seriously question the scale of the SuDS as proposed. This site, as all those in the area, will need to discharge rainwater into the Clyde at some stage. This will require a connection to the existing system before discharge; a purpose built discharge point being disruptive in other ways. Attenuating excessive run-off from a large site is not always obligatory, unless it would detrimentally affect properties *downstream* from it. Presuming that the developers are taking optimum precautions and endeavouring to meet optimum standards (with directive from WDC), we accept that attenuation is necessary. But there are various other ways to do this.

It is presumed that a network of pervious paving will be combined with other run-off systems. The scale of a SuDS reservoir as proposed for the south west corner of the site can be greatly reduced by decentralised and localised smaller SuDS storage compartments. All this will eventually lead to the outflow point before reaching the mains drainage at the lower level. It is unclear how the eastern end of the site will discharge

although this is apparently right around the Craigend House site. (There is no indication of how that site drains). It is conceivable that flow from the western edge of the site to the existing 150Ø drain may at some point need upgrading or duplication - complete with the impact on the environment that that implies.

To state the obvious, Sustainable Drainage Systems (SuDS) is there to *maximise amenity and biodiversity benefits, and deliver the key objectives of managing flood risk and water quality*.(CIRIA). To substantiate its scale and form, the context needs to be assessed and this includes what would be affected in excessive flow conditions. In this case, it is not any other development and properties as such, but potential overflow into Havoc Road and Havoc Meadow (which we can envisage in the future as a combination of maintained, but minimally landscaped natural open area and sports facilities). In other words it is an area that can absorb some of the impact. Immediately beyond is the Clyde. This context indicates that some sort of excessive run-off system is indeed required, but should really exceptional conditions occur, it would not be particularly detrimental to property, at least not that which is occupied.

The SuDS as proposed will have negligible benefit to the housing development itself. Why then excavate to this extent, in this location, with this level of destruction to what the local community identify as of great value in these circumstances? For a SuDS scheme to benefit the development, it should be smaller and distributed across the site and not at the far end of it. There are various alternative ways to achieve this.

We therefore do not accept the scale, form and location of the proposed SuDS system as shown in Options 1 and 3. It appears that the developers currently expect to build Option 1 and this is problematic as it is currently designed. There may be some solution in greatly reducing its scale, keeping it further back from the cliff face and distributing localised smaller SuDS facilities around the site.

We are greatly disturbed by the proximity of the SuDS as proposed being so close to the sea cliff edge and right above the historic Havoc Hole. This is quite unacceptable due to the degree of disturbance and damage to this feature. There is a very distressing annotation on the respective drawing. This notes : *Significant earthworks required to remove existing mound / rock outcrop. Further topo survey required to confirm boundary tie-in levels and thus suitability of SuDS location*. This immediately puts into question the level of consideration before selecting this location. The drawing clearly overlays the proposed SuDS layout over the contours and together these two points indicate a disregard for the actual natural features.

This blatant disregard for the value of the sea cliff as a natural feature and its historic context epitomised in Havoc Hole is disturbingly and unbelievably reflected in the following found in the annotation for SuDS Option 1 :

*Option 1 is located in the westernmost area of the site and is the current proposed location. Although partly within the area of an existing mound, it is the natural low point of the site and therefore the most suitable location regards hydraulics. Because of this, the upstream drainage can be installed at a shallower depth and therefore offers a benefit in terms of the health and safety of operatives during both installation and future maintenance. The rock generated from excavating the existing mound could also be reused within roads capping or structural platforms thus reducing the amount of imported stone required. Although this will result in the loss of some mature trees in the area, it is*



*the most appropriate location when assessed against other options.*

With regard to “*in terms of the health and safety of operatives during both installation and future maintenance*” note the implied destruction of the cliff and present natural undulations that appear in this are. Such safety concerns ignore those to do with working against a cliff edge, albeit not very high, unless through driving heavy plant in from the lower level outwith the actual site.

The volume of rock so generated for potential reuse would be much greater than if simply landscaping a suitable depression further into the site. From all outward signs the rock so excavated would be used for bulk fill for road construction on the site. The actual topping layers would still need to be imported. The saving in material would be negligible compared to the loss in other ways. Whether the excavation is actually of the cliff edge itself or not, any excavation too close to it would mean its collapse.

In essence this all means that the current sea cliff and historic Havoc Hole would be destroyed because the developers cannot be bothered to recognise the existing values.

We cannot accept this.

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## POLICY

At national level it is worth looking at the Historic Environment Policy for Scotland (HEPS). It opens with : *Everyone has a place that matters to them - from a natural landscape shaped by human history to a childhood home built in the '70s. The importance of these places often goes far beyond what can be seen or touched. They resonate with our sense of place, identity and well being. We collectively have a duty of care for our historic environment.*

In this case, the sea cliff and cave are very tangible; a real place with very evident physical benefit. It is the historic associations and local meaning that are somewhat intangible. The importance of *intangible cultural heritage* is being given greater recognition in Scotland reflecting worldwide initiatives through UNESCO. It is a broad subject in its own right; the local considerations being that of local concern.

Considering the local context, it is pertinent to quote the whole section of HEPS as it is relevant here. (Our emphasis).

### **Policies for managing the historic environment :**

1. Decisions affecting any part of the historic environment should be informed by an inclusive understanding of its breadth and cultural significance.
2. Decisions affecting the historic environment should ensure that its understanding and enjoyment as well as its benefits are secured for present and future generations
3. Plans, programmes, policies and strategies, and the allocation of resources, should be approached in a way that protects and promotes the historic environment. If detrimental impact on the historic environment is unavoidable, it should be minimised. Steps should be taken to demonstrate that alternatives have been explored, and mitigation measures should be put in place.
4. Changes to specific assets and their context should be managed in a way that protects the historic environment. Opportunities for enhancement should be identified where appropriate. If detrimental impact on the historic environment is unavoidable, it should be minimised. Steps

- should be taken to demonstrate that alternatives have been explored, and mitigation measures should be put in place.
5. Decisions affecting the historic environment should contribute to the sustainable development of communities and places.
  6. Decisions affecting the historic environment should be informed by an inclusive understanding of the potential consequences for people and communities. Decision-making processes should be collaborative, open, transparent and easy to understand.

The disregard for the value of sea cliff and Havoc Hole is blatantly contrary to this.

At a local level, this is covered by the **Local Development Plan 2**. This though deals with areas and boundaries. The impact, as here, of development straddling a boundary is not well defined and it would probably have been unforeseen that the extent of disruption on the boundary itself would be contemplated by a developer at the time of its formulation. Having said that, the LDP2 map, as noted above under GEOLOGY, clearly shows a symbol at the point of Havoc Hole as being designated as ENV1 Local Nature Conservation Sites (Geological)

It is clear therefore that disruption of the sea cliff together with Havoc Hole as currently being contemplated by the developer is in contradiction of policy at both national and local authority level.

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**The Lennox Heritage Society objects to this application. Of particular concern is the proposed severe intervention to the sea cliff and Havoc Hole.**