



Clyde Docks Preservation Initiative

*Protecting and Promoting the Evolving Maritime Heritage of the Tidal River Clyde*

18 April 2019

West Dunbartonshire Council  
16 Church Street  
Dumbarton  
G82 1QL

## Comment in Favour of Planning Application

### Application Details:

**Reference Number:** DC19/046

**Address of Proposal:** Site At Former Carless Oil Terminal Erskine Ferry Road Old Kilpatrick

**Proposal:** Erection of fabrication building, yard area and ancillary office building with access road, parking, gatehouse and associated infrastructure

### Clyde Docks Preservation Initiative wish to make the following comments in respect of the above planning application:

#### 1. Overall View

In review of the documents associated with this planning application we have identified no grounds on which we believe consent should not be granted.

We welcome the proposed development, support the planning application in its entirety and do not recommend any additional planning conditions to be attached to granting of consent.

#### 2. Engagement With Statutory Consultees

We note the extent and professionalism of the engagement of statutory consultees by the applicant in preparing the application, particularly engagement with SEPA in terms of management of flood risk at the application site. We also note that Scottish Water have indicated sufficient capacity at nearby waste treatment plants to service the proposed development.

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CDPI is a research, networking and advocacy social enterprise concerned with the protection and promotion of maritime heritage along the River and Firth of Clyde.

The Clyde Docks Preservation Initiative Ltd. Company no. SC508514  
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### **3. Environmental Impact**

In review of the EIA Non-Technical Summary we note the following points:

- ❑ The current designation of the site as contaminated land (EPA 1990) will be remedied and removed by the proposed development thus eliminating an environmental hazard to human health and the ecological environment. As well as removing the risk of spread of the contamination by flooding
- ❑ We note appropriate consultation with stakeholders and statutory consultees in relation to the EIA
- ❑ We believe the EIA is appropriate in scope and detail for the proposed development
- ❑ We welcome the identified measures to protect ecological habitats including marine remediation (Mitigation and Enhancement 5.5.9.) before any construction activity (water quality and impact on fish from disturbed contaminated sediments)
- ❑ We welcome measures to minimise disturbance of marine mammals and migratory salmon during the construction phase
- ❑ We note that much of the environmental measures required are dictated by legislative compliance and acknowledge the professional approach to this that the EIA documents demonstrate (in contrast with other planning applications we have reviewed elsewhere from other applicants)
- ❑ We welcome the reference to cultural heritage in the EIA and would wish to further note that we regard (maritime) heritage as an evolving concept that the proposed development will make an important positive contribution to the future of on the Clyde

### **4. Pre Application Consultation**

We acknowledge that objections to the proposed development were expressed at a public exhibition in the local community during the statutory pre-planning consultation.

Further we note that these objections were based largely on desire for the site to become a nature reserve area and also regarding loss of public space.

However we note that due to the condition of the site (including contamination, potentially unstable remnants of structures and contaminated water ponds) it cannot currently be regarded as a nature reserve or as a safe space for public use. In its present state (and if left undeveloped) the site is a potential health hazard to humans, pets and wildlife as well as presenting a risk of contamination leaching into the Clyde and into nearby groundwater. The proposed development would remove this risk of contamination of nearby locations.

Thus while we sympathise generally with the desire to create and manage natural space on the banks of the Clyde; we do not consider this site, as suburban brownfield, as particularly suitable (at least not in its entirety) for such. Nature reserve management should focus primarily on the protection of existing wild space, greenfield sites and brownfield sites that are not suitable for regeneration. It is appropriate that new industrial and commercial development make use of brownfield locations such as the site of this application.

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We believe a business case is needed to support the potential costs involved in remediation of the land at this site. This remediation is necessary and leaving the site heavily contaminated as it is (as some have suggested in response to the consultation) cannot be deemed an option. Particularly in light of increased risk of coastal flooding of the site due to climate change having the potential to release this (currently largely contained) contamination further afield. Without a business case for the site the cost of land remediation would need to be met out of already stretched public funds.

Due to the need for the site to be decontaminated we believe that the net long-term impact on flora and fauna in the wider local area (as a result of the proposed development), which the community have expressed concerns about, would be positive. Additionally planting of trees and soft landscaping in the development will create habitat for e.g. birds, bats, insect life, etc

We also note that no other major development of the site (e.g. housing or retail) has been suggested in response to the pre-planning consultation.

We welcome that the applicant has taken all views expressed at the public exhibition into account and has sought to constructively address and allay concerns that were raised.

## **5. Main Points of Our Comment**

In review of the design of the proposed development we have noted the following positive aspects:

- Landscape improvements and improvements in appearance of the local area would be rendered by the proposed development
- Improved safe river access would be rendered by the proposed development
- Improved industrial/maritime access to the river will be created which will help to promote and enable further investment in maritime/marine business in the area
- Will enable other maritime/marine businesses to locate at the site creating further local jobs and investment
- Deep water access connecting to a global maritime network in a relatively sheltered location
- Users of the site will benefit from ease of connection to the national road network via the Erskine Bridge/M8 and frequent service rail connection to and via Glasgow Queen Street and Glasgow Central
- Will enable investment in ancillary businesses e.g. shops and food service businesses locally (including during the remediation and construction phases) which will support the local economy/community as well as providing them a connection to and stake in the development. Potentially such ancillary amenity could also benefit public users of the Forth and Clyde Canal and Cycle Path (e.g. as a stopping point for refreshments)
- Potential to support the need for other maritime facilities on the Clyde e.g. dry docks and thus the case for existing and new facilities elsewhere on the Clyde to continue to receive investment will be strengthened

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- ❑ Will establish a clear precedent case to ensure land and quayside needed for maritime and marine purposes and industry development is not lost to housing and retail development. Not only at this site but supporting the need to safeguard and maintain scope for existing, mothballed and new facilities and sites throughout the Clyde and Firth of Clyde region
- ❑ Developing the site will remove contaminated soil and groundwater and so also remove the risk of leaching to the Clyde and any nearby aquifers/groundwater
- ❑ Flood mitigation strategy will reduce the risk and impact of flooding in the vicinity
- ❑ Developing the site will address the risk of unexploded ordnance still being present that could otherwise present a serious public safety risk
- ❑ Will continue the use of the site as a maritime/marine industry facility, protecting and continuing the maritime heritage locally and in the context of the Clyde; while transitioning to modern, clean and sustainable industry
- ❑ The design of the fabrication hall will provide a visual balance to the Erskine Bridge Hotel that is situated on the south bank of the river and provide a framing of the landscape along with the bridge itself and nearby electricity pylons
- ❑ We welcome the extent to which the applicant has engaged West Dunbartonshire Council Place & Design Panel in the external cosmetic/architectural design of the fabrication hall building. We also welcome the approach to the visual design of the building exterior / use of architectural features and the proposed design that has been arrived at. This will create a contemporary landmark building for the local area that will also signify and symbolise the maritime industrial regeneration of the Clyde (as a 'beacon' or 'sentinel') with a modern and minimalist design
- ❑ We consider the relationship of the fabrication hall building to its surroundings as proposed is positive
- ❑ We welcome the proposed use of LED exterior lighting for the development and photovoltaic panels to be installed on the roof of the building, from the point of view of energy efficiency and minimising carbon footprint. We believe this should be adopted as a standard requirement in planning new developments in general in West Dunbartonshire (and indeed nationally in planning guidance/policy)

**6. General Comments on (Modern) Maritime Heritage:**

If this development goes ahead as proposed it will make a significant contribution to the continuing development and survival of the Clyde's maritime heritage; something that has been under severe threat and pressure in recent decades. It is also significant that this development is being proposed by a company that itself has a long-standing history associated with Clyde shipbuilding.

We assert that maritime heritage exists not only in relation to the history of industries and shipping, nor is it about preserving historic fabric in aspic. It is also about the present and future development of these industries and the communities they support. Thus we believe West Dunbartonshire Council and other relevant agencies should do all possible to facilitate this proposed development.

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We are looking at this proposal in a wider context alongside for example the rescue and modernisation of the Feguson Marine shipyard in Port Glasgow, continued investment in the Greenock cruise ship and container terminals, commitment to maintaining dry dock facilities at Garvel and potential for Govan dry docks and Inchgreen dry dock to be brought back into industrial/maritime use. Thus this proposed development would be an important building block in revitalising the Clyde as an industrial and maritime river – but with modern, clean, sustainable industries. It will also provide a boost to the local economy and create much needed skilled employment in West Dunbartonshire.

Iain McGillivray

Executive Director

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