

## **Objection to Planning Application**

18/01993/MSC | Erection of mixed use development comprising retail, office, leisure (including cinema/casino), commercial, education, bars/restaurants, hotel and residential floorspace together with public open space, associated access, servicing, infrastructure, parking and landscaping:— Approval of Matters Specified in Conditions 01 and 02 of Planning Consent 17/00610/DC). | Site At Glasgow Harbour East At Castlebank Quay/Pointhouse Quay/ Yorkhill Quay Glasgow

Clyde Docks Preservation Initiative (CDPI) wish to lodge an objection to the above planning application.

#### **Foreword**

Our team and academic contacts have undertaken extensive comparative analysis of other European and global cities with post industrial waterfronts and we have found there is an early 21st Century tendency towards gentrification of our river-fronts where commercial housing developments take the land out of the public domain for future generations - giving it over instead to private, gated developments that cut off people from their rivers.

Successful cities not only have mixed use public space on their waterfronts, they also have local distinctiveness that reflects the history and the heritage (avoiding maritime "kitsch") with buzzing river traffic, enterprise, industry, distinctive shops/cafes/bars and recreation.

The site of this proposed development is hugely historically significant: located as it is at the confluence of the rivers Clyde and Kelvin. It was the crossing point for commerce and kings of the ancient Kingdom of Strathclyde. It was the site of "Clydebuilt" shipyards during the 20th Century and these plans fail to address or incorporate any of that rich heritage. Furthermore, as we edge towards the middle of the 21st Century, reindustrialisation is trending throughout the world and reindustrialisation of waterfronts with new, digital/green energy industries (e.g. Hull) or a reinvention of traditional industries like shipbuilding (e.g. Port Glasgow) is the emerging trend. This trend is reflected in the UK's industrial strategy as well as Scottish and local government priorities around sustainable jobs, training and employment.

We already have the existing phases of Glasgow Harbour and other private housing developments along the Clyde. If we grant permission to more of the same, we are delivering a discredited, old-fashioned form of riverfront regeneration and eradicating any possibility of a cultural planning approach that is sensitive to emerging future thinking.

As one of the few cities in the world with undeveloped riverfront, Glasgow and the Clyde have a window of opportunity to be a world leader. It would be short sighted of us to sacrifice the opportunity to create an exemplar *Industrial City 2* incorporating smart heritage/tourism and

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enterprise development in favour of an approach that is already as dated as Corbusier's in the 1960's.

We are lobbying for a moratorium on allowing more housing developments on the river Clyde until proper assessments of the potential for future trends and the holistic opportunities the river corridor presents are undertaken. This must be a central consideration in producing the next City Development Plan.

### **Reasons for Our Objection**

We consider that significant parts of the development plan for this site as proposed are not suitable or appropriate for the location. While we do not object to the proposal in its entirety there are significant aspects we would wish to see subject to significant further planning conditions being imposed (however we are doubtful that the necessary amendments for us to support development of this site can be achieved through further planning conditions and the masterplan for this site must be revised in its entirety). These include:

### 1. Future Plans to Develop Four Blocks of High Rise Flats Along the River Clyde Edge

- 1.1. This will add to the extent of enclosure of the river by large scale private housing development and further "canyonise" the river corridor. More needs to be done to create larger areas of open public space and diverse amenity that would open the waterfront up to public and seasonal use.
- 1.2. Additionally such (architecturally insipid just like the first phase of Glasgow Harbour) buildings would add to further obstruction of views of the Clyde skyline from the southern bank. Further visual impact assessment is needed to determine the effect on line-of-sight views of key landmark buildings from significant vantage points.
- 1.3. In particular this will have a detrimental impact on views towards the historic A-listed Govan Graving Docks, as well as key landmark buildings such as Glasgow Science Centre, Riverside Museum, University of Glasgow and the Water Row / Govan Cross area (important historic buildings such as the Pearce Institute, Govan Old Church), the Clydeside Distillery and the Clyde Auditorium ("Armadillo"), Finnieston Crane and the Barclay Curle Crane at Whiteinch. The view West from the Riverside Museum, with windows oriented towards key views by design, would be significantly and negatively impacted.
- 1.4. As a result planners should require these buildings be excluded from the plans if the application is to be approved.
- 1.5. If tall buildings are to be included in the development they should be confined to the north of the site nearer the road and spaced further apart creating a semi-circle which would open up the banks of the Clyde and Kelvin in a way this proposals would fail to do by lining them with block buildings.



#### 2. Inclusion of a Cinema in the Development

- 2.1. There are already several cinema complexes on or near the bank of the Clyde at Springfield Quay, Braehead, Glasgow Science Centre Imax and soon to open at the St Enoch Centre. Development of an additional cinema at this site is therefore not appropriate and we would question whether there is need or demand for this.
- 2.2. Another large cinema on the waterfront is not needed unless cinemas are what Glasgow City Council want the Clyde to be famous for in the 21<sup>st</sup> Century.
- 2.3. As a result planners should require this cinema be excluded from the plans if the application is to be approved.

#### 3. Inclusion of a Casino

- 3.1. With existing casinos already on the waterfront, concerns about gambling addiction should be given serious consideration. The allowance of a casino on this site, in a city with relatively high levels of unemployment and personal financial insecurity, should be categorically ruled out.
- 3.2. We do not consider a casino to be appropriate in a development that would also include a considerable amount of student accommodation. Glasgow City Council must seek the views of its own Licensing Board as well as universities and student unions with respect to this aspect of the proposal and potential impact on for example student debt.

#### 4. Location, Setting and Appearance

- 4.1. The site presents an opportunity to enhance and respect the setting of the adjacent Riverside Museum and reconnect Partick to the river in a way that will not be delivered if this development proposal is approved in its current form. Further extensive student accommodation, occupied by transient residents, will not contribute in any meaningful way to community development in Partick.
- 4.2. The nature of the proposal is the same kind of mixed-use residential and retail development of the type created all over the UK with nothing particularly unique to the setting.
- 4.3. More needs to be done than this proposal has outlined to develop the confluence of the River Kelvin and the River Clyde into an attractive hub that would be an important focal point for the city. As well as to contribute to the visitor and tourism potential of the area. Tourists and visitors won't come to Glasgow to look at more cinemas, retail parks and student accommodation that are already well provided for in the city. The opportunity this site presents is to develop a location of international renown to reiterate that would further enhance the setting of the Riverside Museum.



#### 5. Historic Significance of the Site

The proposal has failed to address the historic significance of the site as being the location of the former the A&J Inglis shipyard where the PS Waverley was built. So far only use of the word "harbour" in Glasgow Harbour alludes to anything connected to maritime industry.

See also item 1.3. above on obstructed views of key landmark features and buildings.

#### 6. Nature of Retail in the Development / Retail Competition

- 6.1. With considerable vacant retail space and low-grade retail tenants even in the city centre of Glasgow, the need for extensive retail space apparently aimed at national chain retail tenants, is highly questionable at this location. Glasgow is widely regarded as the best shopping location in the UK outside of London an accolade that is currently under threat.
- 6.2. The focus of retail in this area needs to be geared towards small and creative businesses and affordable rents/rates. Example should be taken from the successful regeneration of areas such as Finnieston and consideration given to how this type of development (as opposed to larger retail, cinemas, luxury accommodation, office space, monolithic high rise blocks, etc) can be extended to Glasgow's waterfront. The opportunity thus would be to create a cultural hub around the waterfront and take advantage of the opportunities presented by the River Clyde as a key resource for Glasgow. The waterfront should not just be seen as empty sites as fodder for "regeneration", that is primarily driven by short-term profit interests of speculative property developers, who tend to seek to cash-in on current short-term development trends of dubious sustainability (the luxury student accommodation boom being a case in point).
- 6.3. Unless the nature of retail included in the development of the site is restricted (in terms of unit size and the types of tenants that are targeted), any inclusion of major retail will create further competition for the city centre which, looking at Sauchiehall Street in particular (as well as for example planned developments at Trongate), is already under severe pressure from out-of-town shopping centres, online retail, austerity and falling real-term incomes (as well as several high profile retail chains going into administration in recent years). This could also call into question the demand that is likely to exist for retail on this site given the retail aspect of the proposed development is entirely speculative.
- 6.4. Additionally pressure would also be put on retail on nearby Dumbarton Road in Partick and in Govan, particularly once the footbridge to Govan in completed. This could undermine progress of the townscape improvements that are already being taken forward in Govan by the Central Govan Action Plan (CGAP).



- 6.5. It is worth bearing in mind that new retail units that were included at Glasgow Cross in the newer blocks of flats remained empty for some time (and even the rest of the Glasgow Cross / Trongate area is still dominated by pawnbrokers and "pound shops" despite being the historic centre of Glasgow) and a similar scenario could be likely with retail development at the site of this proposal. It appears that allowing the destruction of the High Street area with unsympathetic modern developments is now being revisited. A similar change of direction is needed for the river corridor.
- 6.6. Another example that should be looked at is the impact that the Braehead Shopping Centre has had on retail in Paisley and Renfrew.
- 6.7. Green shoots of successful regeneration have already been seen in Glasgow with for example Spiers Wharf / The Whisky Bond, Barras Art and Design, SWG3 and popup retail / street food at various locations. However these types of initiatives have not yet benefited from the opportunity for enhancement that being right on the Clyde waterfront could present. Glasgow needs to do more of what has worked well, not more of what has failed or had mixed success.

#### 7. Wider Context of Developing Glasgow's Waterfront

- 7.1. The river Clyde needs amenities that will make the entire waterfront safe and desirable for locals, visitors and tourists throughout the day and late into the evening (cafés, bars, restaurants, small late-opening retail, river taxis, etc). Not a waterfront that is effectively deserted in the evenings. Development of the waterfront needs to be considered hand-in-hand with tackling antisocial behaviour.
- 7.2. A more connected strategy is needed for regeneration of Glasgow's waterfront. This development proposal represents the risk of further loss of opportunity sites to develop the Clyde in the way other river and maritime cities have very successfully made use of their waterfronts. Waterfront regeneration in other cities needs to be looked at as exemplars; e.g. Dundee, Cardiff Bay or London's South Bank, as well as more traditional European waterfronts e.g. Stockholm, Copenhagen, Lyon, etc.
- 7.3. We suggest that development of this site must be stalled or at least significantly curtailed in scale until a proper connected strategy for regeneration of the city's waterfront is in place.
- 7.4. The strategy behind this proposal is more than a decade out of date. Glasgow City Council needs to seriously consider whether the proposal is appropriate for the site and whether it is appropriate to effectively turn the river Clyde into a canyon, lined with large monolithic buildings that will become dated and weathered after only a few years.



- 7.5. Parts of the proposed development could work very well if expanded throughout the site with less density. For example the low-rise retail units shown in the typical shop fronts sheets 2 and 3 (and 3D view sheet 7, 8, 10, 14, 15) of the application documents are suitably reminiscent of wharf sheds. Low-rise building such as these should line the river Clyde and not high-rise blocks of flats. The entire site would be more suited to a less dense residential and mixed-use development using low-rise buildings in this style. This would better utilise the opportunity the site presents to reconnect Partick to the river, make best use of the connection with Govan and its historic centre and develop a waterfront "village" with a real community hub. This would deliver on the needs of the city and its communities as opposed to the current proposal, which is driven purely by narrow private profiteering.
- 7.6. The reaction to news articles about this proposed development on social media has been overwhelmingly negative. Glasgow City Council needs to consider whether it can continue to ignore the views of its citizens by allowing quick private profit to be the primary driver of waterfront development, at the expense of opportunities to develop the river into a major centre of tourism, a key asset and an artery for the city. If the river becomes lined entirely with blocks of flats, hotels, cinemas, casinos and chain franchise restaurants, it would become a "Las Vegas Strip". As a result there would no longer be opportunity to develop the river as a cultural hub in the way that other river cities in Europe have done and hugely benefited from.

# 7.7. Lessons need to be learned from the failures of the first phase of Glasgow Harbour to deliver on its early promises.

7.8. In our research into the planning history of Govan Graving Docks (report available at http://www.cdpi.org.uk/research\_development.aspx#case\_studies), we identified several key policy objectives for waterfront regeneration that were stated in a 2002 Glasgow City Council Development and Regeneration Services report. These are listed below and the development of this site as proposed in this planning application would represent another failure and loss of opportunity to fully pursue these objectives:

"Regenerate the River's infrastructure taking account of flood risk assessment, quay wall stability and continuous management issues relating to flow regimes, bridging, environmental quality and protecting natural habitats"

## "Investigate the concept of a Linear Park along the River Clyde Corridor"

"Establish stronger links with the City Centre, the Green Network and improve access to the River"  $\!\!\!\!$ 

"Promote greater biodiversity and environmental sustainability through the expansion of the City's Green Network along the River corridor"

"Reinforce the character and containment of Govan Road through the introduction of buildings of an appropriate scale and mass"



"Achieve greater integration between key development sites along the River corridor, with the objective of delivering the full potential benefits of comprehensive regeneration particularly the repair/redesign of quay walls and accessibility to the River"

"Identify and promote Glasgow's 'River Clyde' as a visitor/leisure destination on the UK canal and maritime network"

"Evaluate the provision and management of additional moorings and infrastructure to support canal /water based leisure activities"

"Encourage the imaginative redevelopment of Govan Graving Docks to fully exploit the sites unique architectural and maritime heritage"

"Promote the River Clyde as an asset of national importance"

#### 8. In Summary

8.1 While we broadly support the concept of some kind of residential and mixed use development on this site, and support certain aspects/features of the proposed development, we object to the application (in particular to proposed high rise blocks along the Clyde edge) but suggest that if it is to be approved the following conditions be attached:

Exclude the proposed cinema from the site development
Exclude the proposed casino from the development
Exclude the proposed hotel from the development or at least impose restrictions
on the scale of the building
Exclude non-residents car parking from inclusion in the site development. There
are more than adequate public transport links to it
Exclude tower blocks on the River Clyde edge, instead requiring this to be kept
as open space or to accommodate low-rise buildings with smaller footprint and a
larger public space on the riverfront. These proposed tower blocks would only
serve to further close-off the river
Retail units should be developed with small local business and

Retail units should be developed with small local business and creative/social/cultural enterprise tenants in mind, thus creating an opportunity to expand on the social and cultural benefits that have been seen in Partick and Finnieston in terms of retail regeneration. There would be no benefit from the site seeking to attract major chain retailers that are more suited to city centre or suburban retail park units and which would undercut pricing of independent retailers locally

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- Require the retention and preservation of artefact features (slipway remains, etc) along the waterfront
- Excavation of the infilled dry dock on the River Kelvin and use of this as a feature of the site development

## We are concerned to see no evidence of an archaeology watching brief for this development.

- 8.2. New development of the proposed nature at this site should not be considered appropriate while developments in other parts of the city are stumbling and failing and will be further undermined by this.
- 8.3. Example needs to be taken from the massive shift in attitudes towards the regeneration of Govan Graving Docks and the backlash against the cynical proposed major housing redevelopment at that site.

### 9. Lack of Joined-up Planning

- 9.1. We are extremely concerned at the lack of joined-up thinking between waterfront developments on the Clyde. Individual private sector developers and philistines are pursuing their own speculative narrow objectives without any modicum or semblance of local authority guidance or citywide masterplan/template for sympathetic development of the river Clyde corridor. These developments are driven by separate profit making agendas resulting in excessive duplication and no sense of connectedness or placemaking of the river.
- 9.2. To reiterate, we are lobbying for a moratorium on more housing developments on the River Clyde until a proper assessment of the potential for future trends is undertaken. An assessment of this kind needs to be given the utmost priority by Glasgow City Council, other local authorities along the Clyde and the Scottish Government working in unison and with communities, interest groups and other key stakeholders (e.g. SEPA, Historic Environment Scotland, Chambers of Commerce, Scottish Enterprise, Scottish Natural Heritage, etc).
- 9.3. In the case of this particular development proposal, it presents a mishmash of development features and we see no coherence even within it. The inclusion of high-rise housing, cinema, casino, hotel, student accommodation and "mainstream" retail on a single waterfront site suggests that the most commercially profitable types of property development (in terms of turnaround time for financial return) have been identified. This has led to a narrowly conceived proposal to just cram these in to this development proposal in a location of huge importance and potential for Glasgow and the Clyde.
- 9.4. Glasgow needs to develop significantly greater connectedness and strategy over the creation of tall buildings. For example Anderston and the M8 motorway corridor to the West of the City Centre could be a better locale for Glasgow to develop an iconic skyline incorporating innovative skyscraper developments (in which Glasgow is now severely lagging other major UK metropolitan cities) as opposed to them enclosing the River Clyde or existing in scattered locations.

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(For and on behalf of The Clyde Docks Preservation Initiative Ltd)