



Clyde Docks Preservation Initiative

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

Objection to Planning Application

Inverclyde Council
Municipal Buildings
Clyde Square
Greenock
PA15 1LY

18/0280/IC | Erection of a new build flatted development consisting of 48 No. units over 4.5 storeys - Blocks 2/3A and 3B within the James Watt Dock housing development. | Vacant Brownfield Site James Watt Dock - Blocks 2/3A And 3B Greenock

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

We are concerned at the loss of waterfront space on the Clyde needed to support future development and expansion of maritime and marine activity. Including but not restricted to sailing and other recreational activity, public amenity / access to the river and development of facilities and infrastructure for new marine industry.

A moratorium on allowing further residential development on the waterfront, that would constrain expansion of marine industry and other maritime facilities, should be declared until the economic benefit of these industries has had the opportunity to be fully appraised. Loss of such sites to residential development will mean they will never be recovered for maritime use. Approval of this scheme would serve to create a further barrier to future maritime investment and thus creation of sustainable, long-term skilled jobs in Inverclyde. Until such time as marine industry development and related infrastructure has been appraised (taking into account the views of key public sector, private sector, third sector and community stakeholders) the focus of meeting demand for residential development should be on inland sites.

The proximity of the location to industrial facilities such as the Garvel Dry Dock means the suitability of this site for residential development should be called into question. An assessment of peak noise and other environmental factors (dust, paint spraying, blasting, etc) from the Garvel dry dock to the West and the CEMEX concrete plant to the East impacting on the site of this proposed development should be undertaken.

Allowance of development such as this could serve to deter future investment in the industrial capacity of existing sites (due to potential objection from residents), which would pose a threat to local jobs and by extension to the local economy.

An assessment of light pollution from floodlights at the nearby Cappielow Park stadium impacting on the proposed development should have been made. We see no evidence of this.

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 limited by guarantee no. SC508514
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An assessment of impact on traffic access to the Garvel dry dock, as well as other waterfront industrial units and the marina (and other mooring/berthing facilities), should have been made. We see no evidence of this.

In reviewing the documents associated with this application we see no details relating to assessment of the flood risk from coastal inundation, particularly as it could affect the ground floor properties in the proposed development. Flood risk should ideally have been modelled for a 1/200 year probability flood event and allow for rising sea levels due to climate change. However we see no evidence that this has been conducted. We also see no data in the application stating the AOD elevation of the ground floor properties. We would recommend the council do not consider this application without seeking opinion on these issues from the Scottish Environment Protection Agency (SEPA).

Scottish Planning Policy has a presumption against allowing new residential development on a flood prone location and the guidance surrounding this has been updated in recent years. A full appraisal of the impact of policy on flood management should be undertaken before this planning application can be properly considered. We note that the site of the proposed development is in close proximity to areas of medium-high risk of coastal flooding based on the most recent data from SEPA.

We are concerned that this proposed development would act as a 'Trojan Horse' for what would eventually be the redevelopment of the entire Garvel Island and Inchgreen area for residential use. This could result in growing pressure and demand from incoming residents for the existing industrial facilities (such as the Dales Marine dry dock facility) to close and the work to be relocated elsewhere in the country with loss of local jobs. The opportunity to avert this must be taken by refusing consent for this proposed development.

Given that local needs are for affordable housing, the creation of expensive waterfront flats (potentially occupied predominantly by people who will commute to the Glasgow area) is unlikely to be of benefit to the local community.

Iain McGillivray

Executive Director

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