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Monday 13 May 2024

Saddleworth Neighbourhood Plan Regulation 14 Consultation – Comments from the Canal & River Trust

Thank you for your consultation on the above document.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Canal & River Trust (the Trust) is a statutory consultee in the Development Management process, and as such we welcome the opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded and enhanced within an appropriate policy framework.

The Huddersfield Narrow Canal runs through the area covered by the proposed Neighbourhood Plan. It forms a significant blue/green infrastructure asset, which can serve as a catalyst for regeneration; a sustainable travel resource for commuting and leisure; a natural health service acting as blue gyms and supporting physical and healthy outdoor activity; an ecological and biodiversity resource; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape; and can act as a contributor to water supply and transfer, drainage and flood management.

The Trust believe that access to our waterways can provide multiple economic, social and environmental benefits to local communities. The Trust are developing a framework to measure the benefits of waterways. As part of this, our 2017 nationwide Community Survey (carried out in conjunction with Kanter TNS) identified that 30% of visitors to our network do so for health/fitness reasons; and 90% of users agree that the canal is a good place to relax/de-stress.

The Trust broadly encourages policies which seek to:

- Protect the heritage, environmental and recreational value of canals, rivers and other waterscapes and to safeguard them against inappropriate development;
- support the ability of waterways to deliver economic, social and environmental benefits to local communities and the nation as a whole; and
- secure the long-term sustainability of the inland waterway network, their corridors and adjoining communities.

Please find below comments from the Trust in relation to the draft plan:

Canal & River Trust Planning Team

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Local Green Space Designations

Paragraph 5 on page 16 of the draft document highlights that the Canalside (Uppermill and Diggle) is an important open space area. The Trust is unsure if this includes the canal towpath or any operational Trust land, as the land is not marked on a map. We note that the Neighbourhood Plan does not wish to specifically designate this land as a Local Green Space. However, the text suggests that consideration could be given to this designation in the future.

We wish to highlight that any Local Green Space Designation could have unintended consequences detrimental to the positive management of our land, should it be proposed. As a result, we would not encourage this designation to apply to Trust owned land.

The National Planning Policy Framework states that policies for managing development within Local Green Spaces should be consistent with those for Green Belts (paragraph 103). The Canal & River Trust is the statutory undertaker with responsibility for regulating navigation on the adjacent waterway. Its primary duty, as set out in S10 of the Transport Act 1962 is to 'provide to such an extent as they may feel expedient services and facilities on the inland waterways owned or managed by them'. We therefore benefit from permitted development rights under the Town and Country Planning (General Permitted Development) Order 1995. This would remain unchanged by the designation. A Local Green Space designation may, however, restrict proposals which are outside of the scope of our permitted development rights but are nonetheless in accordance with our charitable aims of providing wider public benefit. This could include improvements to visitor facilities or the provision of equipment necessary to allow for the function of the canal (such as water management).

Policy 8: Design Masterplans

Large scale developments in proximity to our waterways have the potential to significantly impact the outward appearance of our canal. They also present opportunities to improve local engagement and accessibility to our network.

The provision of a design masterplan could help ensure that the impact to green and blue infrastructure is appropriately managed, and could also help to ensure that development engages positively with the wider blue and green network.

We note that the final bullet point on page 29 "create an accessible multi-functional green infrastructure network" could help to promote these aims. However, we believe it is vague and open to interpretation, which could make the aspirations of the plan less effective.

We would therefore encourage expansion of this bullet point to address how development should interact with green and blue spaces, to provide more certainty to developers and decision makers. For example, suggested text is provided below@

"Create an accessible, multi-functional green infrastructure network. Integrate existing areas of blue and green infrastructure into the development with consideration given to the provision of access, surveillance and the orientation of buildings to promote positive engagement with the wider blue/green infrastructure network."

Policy 10: Safety and Wellbeing

The draft policy text seeks to ensure that major developments provide for new and/or enhanced routes for active travel. We note that the canal towpath provides a traffic free, linear route for walking and cycling activities.

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We wish to highlight that off-site improvements to existing walking and cycling routes may be required in some cases, so as to maximise opportunities for walking and cycling. For example, the Trust maintain our towpath network to a 'steady state' based on existing use. Additional use of our towpaths brought by new development may require improvements to the surface so as to minimise risks of erosion, and to encourage use by new users.

To maximise the use of walking and cycling infrastructure, and to make the policy as effective as possible, we request that **reference should be given in the policy towards offsite improvements to walking and cycling infrastructure that may be necessary to accommodate the needs of users**, and that this should be taken into account when considering new large developments. This could be incorporated as an additional bullet point within the policy text. Failure to do this could result in degradation to existing routes, which could act against the overall aims of the policy to promote active travel.

The Trust are willing to continue to work with you, to meet and discuss these points for clarity and to seek to work together towards a high-quality Saddleworth Parish that relates positively with the waterway network. Should you wish to discuss any of these points further, my contact details are below.

The above comments do not prejudice any further matters that might be raised at a later stage as the plan/document emerges.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

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<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

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