

On behalf of Canal & River Trust we have now had an opportunity to review the document and have the following comments to make:-

Policy DS17 Supporting Canalside Regeneration and Enhancement

We welcome a policy which sets out the requirements of a specific development plan document relating to canalside development. We would be happy to liaise with the Council on production of such a document. The canals can be used as tools in place making and place shaping supporting regeneration.

Culture, Leisure and Tourism

We welcome the references to the canal network as a historic asset and visitor attraction. We also consider the canals are built heritage assets representing a unique working heritage of industrial architecture, archaeology and engineering structures. We welcome the inclusion of policies within the plan relating to ensuring that development protects, enhances and promotes the special qualities of the historic assets within the District. We consider the canals are important tourism visitor destinations and attractions in attracting day-trippers, overnight stays, domestic and foreign visitors, and weekend and short breaks, as well as providing links to other visitor destinations and attractions.

Policy CT4 Extensions to Tourism, Cultural or Leisure Facilities in Rural Areas

We note the requirements of Policy CT4 Extensions to Tourism, Cultural or Leisure Facilities in Rural Areas. However, the canals are non-footloose assets therefore certain types of development and uses are dependent on the location of waterway infrastructure. This should be recognised to ensure that tourism opportunities relating to the canals can be viewed flexibly for their long term sustainability of the canals.

Policy NE7: Use of Waterways

We welcome the inclusion of a policy relating to the canals within the District and the policy requirements reflect many of our principles.

Any references within the document to us should read Canal & River Trust (with an ampersand "&" not the word "and").

We note that the explanation requires the submission of information relating to discharges to the canal with a planning application. We would suggest that ideally a developer should agree with us if a discharge would be acceptable prior to submission of a formal planning application. Our discharge process is separate to our function as a statutory consultee and has timescales which do not necessarily align with the planning process. Planning permission should not be granted for a form of drainage which may not be implementable.

We would suggest the following changes to the wording:-

Detailed information will need to be submitted to the Canal ~~and~~ & River Trust including calculations showing the relevant catchment areas, run off quantities, outfall size(s) and location(s) and the sizing of oil and silt traps that will be required for their assessment. This must be done prior to submitting ~~when a planning application is submitted~~ for development. Advice of the Environment Agency may also be required.

Local Plan Policies Maps

Our review of the Local Plan Policies Maps has identifies a number of housing commitments (Map 2 H11, H16 and H13; Map 3 H16 and H13; and Map 29 H29 and H30) immediately adjacent to the canal and an employment protection site (Map 3 TC12).

We would require any development at these allocations to not adversely affect the integrity of the waterway structure, quality of the water, result in unauthorised discharges and run off or encroachment; detrimentally affect the landscape, heritage, ecological quality and character of the waterways; prevent the waterways potential for being fully unlocked or discourage the use of the

waterway network. We would seek for any development to relate appropriately to the waterway and optimise the benefits such a location can generate for all parts of the community.

Please let me know if you need any further information in regard to the comments above.