

Thank you for consulting the Canal & River Trust on the Draft Stroud Local Plan.

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 wish to thank the council for the opportunity to engage to with the production of the draft Local Plan to ensure that all levels of planning policy and associated documents provide a robust policy framework that recognises and supports canals as a cross-cutting policy theme; and acknowledges the diverse roles which they perform.

The Trust wishes to ensure that planning policies at all levels, acknowledge and support the multifunctional roles of all of the canals within the district.

Around 96 per cent of land adjacent to the Trusts waterways is outside of our control, which can pose many challenges to the Trust, with development placing extra liabilities and burdens upon the waterway infrastructure, at the same time as providing opportunities for restoration and enhancement. The Trust therefore welcomes our ongoing involvement in the creation of this plan.

The Trust have reviewed the above document and have the following general comments to make:

Within the Stroud district the Trust owns and manages the Gloucester & Sharpness canal and we are a member of the Cotswold canals partnership.

The Gloucester & Sharpness Canal is a valuable asset as it runs through the district. It represents our industrial and cultural heritage, shapes the landscape, adds ecological value, and has a great ability to act as catalyst for regeneration and inward investment as well as providing opportunities for sport and recreation, both on and off the water, thus enhancing the wellbeing of local residents.

The restoration of the Stroudwater and Thames and Severn canals, collectively known as the Cotswold canals, will bring similar benefits to the communities through which they run as we truly believe that water adds value. However, we ask that the council more clearly acknowledge that the Gloucester & Sharpness canal is already bringing those benefits to the area and that this is recognised with by additional positive references to the canal at various points in the plan.

We will respond in more detail below using the suggested guidance on responding provided by the council.

## Policy

Successful planning policies and decisions can help to improve people's access to and enjoyment of our waterways. Our waterways provide vital access to green and blue spaces, and can provide significant social, economic and environmental wellbeing benefits for local communities.

Waterways are multi-functional assets providing multiple economic, social and environmental benefits. In addition to being a form of green and blue infrastructure, important for leisure, recreation and tourism uses, they can provide local and strategic sustainable transport routes. Both the existing Gloucester & Sharpness canal and the restoration project have a positive impact on the well-being of those who live, work or visit the areas through which they run.

A supportive planning policy framework can assist in unlocking the potential contribution and value of these waterways to economic, social and environmental wellbeing of the district, communities and individuals; along with protecting these valuable assets for the benefit of current and future generations. It is therefore vitally important that planning policy recognises the multi-functional nature of waterways and the contribution they can make to wider economic, environmental and social

objectives such as public health, renewable energy and sustainable development, strengthening resilience and creating conditions suitable for growth.

### **Policy CP6 Developer contributions**

The Trust fully support this policy. We have recently benefitted from a mixture of S106, CIL funding and other funding to delivery towpath improvements from the district boundary towards Gloucester. This has been as a result of support from both the City Council and County Council in their role as highway Authority. Much of the funding came from a development which was not directly adjacent to the canal, but it was recognised that the towpath would provide an active travel route into the city for off- road commuter journeys.

It is hoped that the District Council will work in partnership with Trust partnership to explore funding opportunities to extend these improvements further down the canal. This will allow residents from the housing growth areas on the **edge of Gloucester City, and those wishing to 'ride and cycle'** from the proposed train station at Hunts Grove to use the towpath to travel to work. Improvements will also facilitate both existing and new residents access the open countryside to improve their health and well-being.

### **Housing Policies**

Nationally the number of boaters who now claim that their boat is their main home has increased. We suggest that the need to include this specific type of housing be considered when considering housing need and that if necessary the council consider working with the Trust to identify whether there is a need to more formally consider this type of housing in the future and identify as necessary whether there is a need to provide a policy in the plan.

### **DHC 5 Well -being**

We fully support the inclusion of new policy DHC5 Wellbeing. The Trust promote the G & S canal as a free to use wellbeing asset and we believe Waterways have a role to play in improving wellbeing, inclusion and prospects of communities and individuals. Planning policies and decisions can help to increase the role our waterways have in promoting health and wellbeing for communities. [Independent research](#) shows that spending time by the waterways can make people happier and improve life satisfaction, with an equivalent estimated social wellbeing value of £3.8bn per year nationally.

### **DEI1**

The Trust fully support a district wide walking and cycling strategy and wish to promote canal towpaths as a perfect off road sustainable transport route. The Gloucester & Sharpness canal towpath is recognised by the County Council and Gloucester city council in this way in the LCWIP and emerging LTP (2015-2041). part of the towpath within the district is a Sustrans route. The Trust has recently renewed its memorandum of understanding with Sustrans to promote the benefits of walking and cycling on the towpath **and to work together to enhance the Sustrans' National Cycle Network where it runs over the Trust's towpaths**. The LTP recognises the importance of the restored canal as a cycling route and the opportunities presented for sustainable onward travel when it joins the Gloucester & Sharpness canal.

### **Policy DES3**

The Trust promote our waterways as a man of reducing carbon, not only as a low carbon active travel route but also for the use of canal water for heating and cooling purposes.

Due to its position adjacent to the canal the potential allocation G1 (land south of Hardwicke) should investigate whether canal water can be used for a district heating and cooling system.

## Policy ES11

Maintaining, restoring and regenerating the districts canals is welcomed and supported and we note that all of the districts canals are mentioned.

We note that the policy will seek to deliver the restoration of the derelict canal between Stonehouse and Saul Junction, reconnecting Stroudwater Navigation to the Gloucester & Sharpness Canal, including creating 30 hectares of biodiverse habitat and canal towpath.

The Trust is fully supportive of this aspiration and it must not be forgotten that the Cotswold Canal will link into the Gloucester & Sharpness canal (G & S) in the future and the G&S is vital in linking to restored canal to the wider network. Without this link some of the benefits the restored canal will bring will be limited.

Every opportunity should be taken to ensure that the canals are treated as one and that the benefits or opportunities one brings is not perceived to end at the junction between the two.

Many of the benefits that the Council hope the Cotswold canals restoration will bring to the area are already being provided by the Gloucester & Sharpness Canal. As an example, the G & S is already a recreational and active travel route linking settlements with the open countryside. Its northern section provides a traffic free sustainable travel route to the city of Gloucester.

## Sites

### **PS34 Sharpness Dock**

The Trust fully supports the continued allocation of its land at Sharpness Docks for a mixed used development under draft policy PS34, carrying over the existing allocation in the adopted Local Plan (adopted 2015) under Policy SA5. The Trust has prepared and submitted a planning application for the allocation to progress its delivery. The application deals comprehensively with the allocation in accordance with the adopted and the proposed site allocation. It is anticipated that the planning application will be approved in advance of the adoption of the new Local plan. The planning application provides a comprehensive scheme for the whole of PS34/SA5 comprising development provided for in the policies and includes a masterplan as well clear parameters for the development. Therefore, subject to approval, the requirements in PS34 for the masterplan and development brief will have been satisfied. It is important that the emerging policy reflects any planning permission for the site and where planning permission is granted is reworded to avoid any potential confusion and requirement for further masterplan work to satisfy the policy.

### **PS36 New Settlement at Sharpness**

The Trust wishes to raise no objections to the principle of the proposed allocation PS36. The draft policy PS36 provides limited specific details of the parameters and issues which need to be addressed. The current adopted local plan allocations provide clear parameters and matters to be addressed in any planning application for each of the sites including Policy SA5 at Sharpness. The Trust is of the view that a scheme of the scale proposed should include these key issues for any allocations in the new local plan. As part of the planning application for SA5/PS34 and under the existing Local Plan there has been a requirement to assess the impact of the increase in residents on the Severn Estuary and particularly the Severn Way, and mitigation measures, including a financial contribution, to deliver these have been agreed with the Council. There is no reference in the proposed allocation PS36 to any wider impacts of such a large development on the Severn Estuary and the need for mitigation. It is important that the proposed allocation makes reference to the need for impacts to be assessed and mitigation provided, as necessary, to address these impacts. As this is a known likely issue the policy needs to address it at this stage. The policy as currently worded does not provide for the impact on the wider estuary to be fully addressed. Furthermore, the development of SA5/PS34 includes for substantial areas of open space, significantly over and above

the levels required in association with a standard housing scheme. Should the development of PS36 seek to utilise this area, it will be necessary for the additional associated maintenance and management to be taken into account and addressed through Policy PS36, with appropriate contributions provided to mitigate any impacts.

### **G1 Land south of Hardwicke**

The Trust wish to commence discussions with the Policy team with regard to existing and proposed housing allocations on the outskirts of Gloucester. Significant improvements have been delivered to the Gloucester & Sharpness towpath immediately to the north of the district boundary as a means of providing improved green infrastructure and a sustainable transport route towards the city. This work has been delivered partially as a result of Community Infrastructure Levy funding and S106 as well as through joint funding bids with the county council. We would like to explore the possibility of continuing these improvements further down the towpath, making use of any other funding opportunities, planning obligations or CIL from developments within the Stroud district.

It is noted that the Gloucester & Sharpness canal is the edge of this allocation G1. By including the canal within the red line of the allocation and subsequent masterplan the waterspace could be used as more than just a backdrop to development.

New water sports facilities and access to the water space could be incorporated into the plans and the canal towpath should be incorporated and improved to provide a valuable GI and wellbeing asset as well as a sustainable commuter transport route towards the city.

This would link into the areas already improved, as well as extending the improved stretch to provide recreational links into open countryside. These improvements could be part of an active travel link from the proposed train station towards the southern part of the city and the housing areas in between. A contribution toward such improvement would be supported by policy CP6.

### **Other matters**

There is little mention of the Gloucester & Sharpness canal, although the benefits of the Cotswold Canals are mentioned in several places. The Plan should ensure that the benefits already brought to parts of the district as a result of the presence of the Gloucester & Sharpness canal are not forgotten and are acknowledged in various sections, most particularly;

P22. Vision. The Cotswolds canals are mentioned. This could be altered to 'our canals' to encompass all of the canals in the district.

P62 could be altered to 'Cotswold canals, which link to the existing Gloucester & Sharpness Canal'

P105 Gloucester Sharpness Canal key wildlife site' could be altered to 'The Gloucester & Sharpness canal, which is a multifunctional Green infrastructure asset' to better reflect the range of benefits it brings to the area.

P113. Please correctly title the Gloucester & Sharpness canal, here and elsewhere in the document.

P126-127 The Vision for the Severn Vale. The Gloucester & Sharpness canal should be mentioned as a multi-functional green infrastructure asset which links many of these disparate settlements together and brings a variety of health & well-being benefits to both residents and visitors to this area. It is implied that the opening of Cotswold Canal will bring new benefits to the area, with no mention of the benefits the existing canal already brings. Saul junction already provides an important facility on the G & S canal. If the G & S did not exist there would not be a 'gateway to the Cotswold Canals at Saul Junction'.

The Cotswold Canal is described as a walking and cycling route as well as bringing economic benefits to the area. Surely this is precisely what the Gloucester & Sharpness Canal currently does, yet this is not recognised.

The Trust are very concerned that there is so little acknowledgement of the Gloucester & Sharpness Canal, throughout the document but and particularly in this section which describes one of the honey point sites on the canal without referencing it properly.

The Trust urgently seek a meeting with the council discuss ways in which the plan can be altered to promote the Gloucester & Sharpness canal as a very valuable asset within district.