

Local Plans Team
Central Bedfordshire Council
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Your Ref n/a

Our Ref CRTR-POL-2023-38079

Monday 27th February 2023

Re: Design Guide SPD and Housing Policy Technical Guidance SPD (Consultation)

Thank you for your consultation.

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 Trust is a statutory consultee in the Development Management process.

Based on the information available we have the following comments to make:

Design Guide SPD

Central Bedfordshire contains 6km of the Grand Union(GU) canal, in the southwest part of the District. The Canal & River Trust own and manage the GU canal and also strongly support the proposed Bedford-Milton Keynes Waterway Park (BMKWP) and we are part of the Consortium which was established in May 2010. These are addressed specifically within Policies EE10 and EE11 of the Central Bedfordshire Local Plan, 2021 and it is therefore disappointing to note that the SPD does not include any detailed reference to the GU canal or BMKWP.

The waterways can be used as tools in place making and place shaping and contribute to the creation of sustainable communities. The waterways can be used as tools in place making and place shaping and contribute to the creation of sustainable communities. They serve in a variety of roles, including: an agent of or catalyst for regeneration; a contributor to water supply and transfer, drainage, and flood management; a tourism, cultural, sport, leisure, and recreation resource; a heritage landscape, open space, and ecological resource; sustainable modes of transport; and routes for telecommunications. They also offer opportunities for leisure, recreation, and sporting activities as part of the 'natural health service' acting as 'blue gyms' and supporting physical and healthy outdoor activity. The Trust seek for any development to relate appropriately to the waterway, minimise the ecological impacts and optimise the benefits such a location can generate for all parts of the community.

The presence and importance of the Grand Union canal and BMKWP should therefore be made more apparent within the document. The canal is a non-designated heritage asset in its own right, though there are also sections within designated conservation areas, listed buildings/ structures along the canal corridor, and Sandhole Bridge, a Scheduled Ancient Monument. It is therefore important that the historic significance of the canal is also acknowledged, and the SPD should address this and the specific design considerations for development adjacent

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to the canal to improve the visibility and accessibility of the waterway, as this will assist developers / decision makers when dealing with planning applications.

We recommend a number of guiding principles for waterside developments and individual waterways and water spaces need to be viewed as an integral part of a wider network, and not in isolation. Improvements to integrate the canal corridor into adjacent development and create / strengthen links to other areas of open space should be considered. This could include improvements to the existing towpath, improving signage and creating circular walks or heritage trails.

Water should not be treated as just a setting or backdrop for development but as a space and leisure and commercial resource in its own right. The 'added value' of the water space needs to be fully explored. Waterways themselves should be the starting point for consideration of any development and use of the water and waterside land – look from the water outwards, as well as from the land to the water. The Trust would also require any development at the canal frontage to not adversely affect the integrity of the waterway structure.

A waterway's towing path and its environs should form an integral part of the public realm in terms of both design and management. It is important that the siting, configuration, and orientation of buildings optimise views of the water, generate natural surveillance of water space, and encourage and improve access to, along and from the water. New waterside development needs to be considered holistically with the opportunities for water-based development, use and enhancement. The SPD should encourage developments to improve the appearance from the towing path and from the water at boat level and enhance the environmental quality of the waterway corridor. It should be recognised that appropriate boundary treatment and access issues are often different for the towing path side and the offside.

Future proposals must aim to avoid creating direct views of the developments 'back of house' from the canals outward perspective which heavily degrades the canals credentials as a green corridor, tranquil retreat, and its use as a treasured public amenity. Back of house elements might include car parks, service areas, such as bin stores, delivery areas, sub stations etc.

Any development with a canal frontage is also likely to include visually exposed parking arrangements in areas due to the intrinsic nature of a canal fronting layout. It must however be recognised that vehicles can be visually buffered from the canal's outward views through clever design and use of landscaping. This might include well placed linear hedgerows to visually buffer parked vehicles from the canal's outward views, parking bays set between plots or within buildings, again to hide from view. Staggered bays with surrounding planting can also work to soften visual impacts.

There are also specific considerations in relation to lighting proposed close to the waterway corridor. The Trust advise that waterside lighting affects how the waterway corridor is perceived, particularly when viewed from the water, the towpath and neighbouring land, for example waterside lighting can lead to unnecessary glare and light pollution if it is not carefully designed. Any external lighting should be angled downwards, and light directed into the site, and it should not provide flood lighting to the canal corridor to show consideration for bats and other nocturnal species.

The Trust welcome the references to the 20-minute neighbourhood and promotion of active travel/infrastructure within the SPD, and support for health and wellbeing, social cohesion, reducing health inequalities and provision of inclusive public spaces. The canal towpath is an important traffic free route for walking / cycling for both leisure and utility walkers and provides linkages to local facilities. The towpath would aid in providing a safe, convenient, and attractive walking and cycling network to promote health and well-being, consistent with the aims of the NPPF.

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The Canal & River Trust generally seeks to maintain its assets in a “steady state”, and in the case of towpath maintenance, this is based on current usage. The Trust are supportive of the towpath being promoted as a sustainable transport route particularly where developments and other strategic funding can support upgrading surfacing to the required standard to support this (based on demand levels and design appropriate to the context). Where new development has the likelihood to increase usage, we consider that it is reasonable to request a financial contribution from developers to mitigate this impact or through works in kind by, for example upgrading an access / towpath surface to a standard which is more durable and thus able to accommodate increased usage.

The canal should therefore be acknowledged as an active travel route and the requirement for developments along the waterway corridor to support improvements such as towpath surfacing, access connections and signage/wayfinding and the mechanisms through which they would be provided should also be included.

The design requirements outlined above could be referenced within the SPD to strengthen the design considerations for development adjacent to the canal. We would also encourage potential developers to undertake pre-application discussions with the Trust.

Figure 236 – has the caption ‘*underpass on the canal*’ though this would be better referenced as showing the canal corridor and towpath passing under a bridge crossing rather than an ‘*underpass*’.

Section 12 - The Trust wish to highlight the potential of the canal for heating & cooling and the SPD should be amended to include reference to water source heat pumps and this potential of the canal network to contribute to low carbon technologies.

Reference is also made within the SPD to the inclusion of SuDS to resolve drainage issues. We wish to highlight the potential for surface water drainage to the canal. Any surface water discharge to the canal would require prior consent from the Canal & River Trust. Full details of any proposed discharge would need to be submitted and include appropriate mitigation measures to ensure there was no adverse impact to water quality or structural integrity of the waterway. As the Trust is not a land drainage authority, such discharges are not granted as of right where they are granted, they will usually be subject to completion of a commercial agreement.

Housing Policy Technical Guidance SPD

The Trust have no comments to make on this SPD.

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

Yours sincerely,

Anne Denby MRTPI
Area Planner



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

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