

**From:** Jane Hennell [<mailto:Jane.Hennell@canalrivertrust.org.uk>]  
**Sent:** 17 November 2017 12:41  
**To:** [clerk@alvechurch.gov.uk](mailto:clerk@alvechurch.gov.uk)  
**Subject:** Pre- submission Neighbourhood Plan

Dear Ms Williams

Please find attached our comments on the pre-submission Alvechurch Local Plan. Please do not hesitate to contact me to discuss this response further if that would be of benefit.

Kind regards

Jane Hennell MRTPI  
Area Planner South

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Thank you for consulting the Canal & River Trust regarding the proposed Alvechurch Neighbourhood Plan. The Canal & River Trust (the Trust) do not appear to have been consulted on the draft document by the relevant bodies. The Trust is not a Statutory consultee for local plan matters, although we are for planning applications. Instead we appear on the list of 'other consultees' although the NPPG states that "other public bodies, landowners and the development industry should be involved" in their preparation. We prefer to work closely with local authorities and local communities who are preparing a plan and the Trust has very recently launched a new document. 'What your local waterway can do for your community- a planning guide for waterways in Neighbourhood Plans'.

It can be found here

The Worcester & Birmingham Canal is described in the plan as ' the final piece of the local transport infrastructure, which runs north-south through the Parish' and we welcome the opportunity to comment on the pre- submission version of the plan to ensure that the Canal is properly protected and promoted and the multi- functional benefits that the waterway can bring to the area is properly recognised.

There are several main issues and opportunities which we ask relevant bodies to consider when preparing a neighbourhood plan, aimed at ensuring that the contribution that the canal brings to life in the community is recognised.

These can be grouped under three main headings, People, Prosperity and Places, although they are of course inter- related.

- Health, wellbeing & happiness
- Engaged people & cohesive communities
- Learning & enhancing skills
- Prosperous & connected places
- Green & blue futures
- Cultural & environmental assets

In addition, appendix 2 of The Town & Country Planning Association Policy Advice Note, titled 'Unlocking the Potential and Securing the Future of Inland Waterways through the Planning System' may provide some further guidance and is due to be re-launched shortly to take into account not only legislation changes but also updating the change in priorities in public policy such as the rise of the health and wellbeing agenda. The document can be found here

The Canal runs through the parish and we note that the community hold the canal in high regard and enjoy using it regularly. The plan states that the areas alongside the banks of the River Arrow and canal towpath, accessed from many public rights of way, are also viewed as special by the local community. We are

therefore surprised to note that APNP Policy 17 : Improvement to and protection of open spaces , which seeks to protect and enhance open spaces does not list the canal towpath.

This policy states that development that would result in any loss of the open space or would cause harm to the character, setting, appearance, general quality or accessibility will not be permitted unless the community will gain equivalent benefit from open space improvements or the provision of replacement open space.

It is important to ensure that any development planned in or adjacent to the plan area does not have an adverse impact on the canal or result in its degradation in some way, but instead it is protected and improved for the benefit of all. The inclusion of the canal and towpath would give greater protection to the character and setting of the canal, and make the justification of improvements to accessibility to and along it easier to justify if development would cause harm.

The Neighbourhood plan is an opportunity to set out how the local communities wish to see the canal corridor develop in the future. We would suggest that the plan seeks to enhance the canal corridor, improve access to it and puts a mechanism in place to ensure that the canal, and towpath can cope with the additional use if development occurs, without creating an additional financial burden for those that maintain it.

We note and support that the plan contains policies on good design, local distinctiveness and the historic environment, with canal bridges classified as non designated heritage assets.

APNP Policy 13: Access to the countryside requires development proposals to make every opportunity to contribute to and connect to green networks and improve linkages between green spaces and increase public access to the countryside.

In particular, proposals for new development should:

- • Design new and improved footpaths, cycle-ways and bridleways to connect new development to the countryside, including accessibility provision for people with disabilities.
- • Where possible, provide connections to key places such as; the Meadows, Worcester & Birmingham Canal, River Arrow and parish woodlands that are open to the public. 4.3.54 Priority will be given to the provision of the following:
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The Neighbourhood plan should however recognise that new development will create additional use of the existing Green infrastructure possibly resulting in its degradation. New development may therefore be required to fund improvements to the GI asset to ensure it remains fit for purpose for both existing and new users as recognised supported by the NPPF.

Topic 5: Getting around mentions that at 4.5.15 The Worcestershire-Birmingham canal towpath (recently upgraded) is as well used as any footpath in the area, by both walkers and cyclists alike. Whilst parts of the towpath have now been upgraded there are other areas which would benefit from improvement and The Trust wish to look at all options and opportunities to work with the parish to secure funding for further improvements. The Trust considers the canal to be a very important, multi- functional asset but in this area it is used particularly as a recreation asset and it could, with improvement, provide a sustainable transport route, linking the village with public open space and the wider countryside and the well-used Bittel reservoirs, also owned by the Trust.

APNP Policy 18: sport, leisure and recreation facilities requires, at 4.3.53, Development proposals, which make a contribution to the improvement of sports and recreational facilities or create new facilities that meet the requirements of the local community and are in accordance with BDP Policy 25, will be considered favourably.

- a. Improvement to riverside walks along the River Arrow and linkages to green spaces.

We are surprised and concerned that the canal towpath is not mentioned here, perhaps because elsewhere the plan erroneously implies that the towpath has already been fully upgraded. The towpath provides a free to use green gym, and the Trust has recently publish a document 'Waterway & Wellbeing' which can be found here which sets out the way in which waterways contribute to both health and physical and mental wellbeing.