

In response to Telford and Wrekin Council's input to K24/14a, I offer the following comments:

Non-designated Heritage Assets

- The Shrewsbury & Newport Canals are non-designated heritage assets, so the Council's paragraph 6 is incorrect.
- There are many other Local Authorities that have been "encouraged to consider making clear and up to date information on their identified non-designated heritage assets, both in terms of the criteria used to identify assets and information about the location of existing assets, accessible to the public." Shropshire Council, Bassetlaw District Council and South Staffordshire Council to name but a few. So why can't Telford & Wrekin Council do this?
- The Council's paragraph 7 states that when developments come forward and features are deemed to meet the Historic England Conservation Principles, they could recognise them as non-designated heritage assets. This does not account for any sections of the canals that may not have features that meet the HECP and demonstrates that the Council is not considering the value of the canals' heritage as a whole. Therefore, it has underestimated their heritage value, which has subsequently resulted in their incorrect assertion that they are not non-designated heritage assets.

Further consideration of safeguarding

- The Council has previously demonstrated that restoration is feasible via the provision of S106 funds for canal enhancements to include the Grade II Guillotine Locks (which are Listed Structures) on the Trench Arm, which also forms part and parcel of the canal as a non-designated heritage asset.
- The Historic England listing for these guillotine locks identifies other features of interest on the canal and demonstrates that the context of the designated features is important. Therefore, the line of the canals themselves are considered non-designated heritage assets.
- Other canal restorations that pass through developed areas and/or have addressed significant barriers along their restoration lines, have secured protection in their Local Plans. For example:
 - 1) The Lichfield Canal restoration secured the construction of an aqueduct across the M6 toll road.
 - 2) The Wilts & Berks: route is protected and it runs through built up areas.
 - 3) The Chesterfield Canal Trust has been working with the local authority to move the line of the canal to allow for housing.
 - 4) Derby and Sandiacre Canal is protected in the local plan, running through semi built up areas. This restoration has planning permission.

Derby City Council's new adopted Local Plan (Jan 2017) safeguards the route through the city.

- The Canal and River Trust (CRT) and Inland Waterways Association (IWA) document – '*Local Plans: Delivering inland waterway restoration projects in England and Wales*' gives further information. See: <https://canalrivertrust.org.uk/about-us/our-work/restoration/key-documents>
- Paragraph 12 of the Council's response has no direct bearing on the restoration of the canals. The need for additional Sustainability Assessment and consultation with Natural England has been well known by the Council throughout the Local Plan process and prior to the EiP. The need for any additional work or consultation should not therefore be a barrier to providing the appropriate safeguarding policy within the Plan.

Enabling Development.

Whilst the majority of the route of the canals passes through largely rural areas, there could be planning applications, for both residential and commercial premises, made during the period covered by the Local Plan, which could, via Section 106 agreements, fund their restoration. The plan should consider this mechanism for potential funding.

A potential Safeguarding Policy

The wording as proposed by T&W is considered to be particularly onerous. The following would be more appropriate:

The route of the Shrewsbury and Newport Canals, as indicated on the Policies map, will be safeguarded from any development which would prejudice the future restoration of the canals.

Proposals for the restoration of the Shrewsbury and Newport Canals and any associated canal side development will be supported having regard to the benefits to the canal system and acknowledged benefits to recreation and tourism for the District, provided there will be no adverse impact on the natural and historic environment, including designated sites and habitats, in accordance with Local Plan Policies.

Development proposals which have the potential to impact upon the alignment of the Shrewsbury and Newport Canals (as indicated on the Policies Map) will be required to undertake an assessment of the structures present on the site (including those below ground) to demonstrate that the integrity of the canal alignment and any associated structures are protected and the development would not prejudice the future restoration of the canals.

Finally, the stance that Telford & Wrekin Council has taken over the inclusion of a Safeguarding Policy into their Local Plan is simply not understood. Our Trust

and volunteers have worked hard to bring the canals and their associated structures back to life, by raising funding and carrying out much of the physical work required – all for free! Our 1400+ members are very enthusiastic to further the project, but the council seems to want to stop us restoring what are their assets. Why?

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