



Acres Land & Planning Ltd

'Acres of space'

Response to Council's submission K24/14A.

Further representations on Matter 4: Economy & Community. Shrewsbury & Newport Canal Restoration.

Background.

Telford has a wealth of industrial heritage which evolved and subsequently thrived with the benefit of a canal network developed in the late 18th and early 19th centuries. The canal system rapidly grew within what is now Telford, as a vehicle for importing and exporting raw materials and finished products giving Telford the title of the 'birthplace of industry' – a strapline which it proudly displays on its signage and tourist material.

The Shrewsbury to Wappenshall Canal, together with the Trench Arm and the Humber Arm penetrating what is now Telford, linked to the many smaller 'tub boat canals' (some of which are still tracible) and form an integrate part of this industrial archaeology. They link, through a series of canals, aqueducts and inclined planes to Ironbridge Gorge and the River Severn and therefore form part of the story of the industrial revolution. The Wappensall to Norbury Junction Canal (through Newport) was built later – by Thomas Telford himself – linking the Telford Canal network with the Shropshire Union Canal and thence to Birmingham and the Black Country.

Sadly, despite this rich history, the submitted Telford & Wrekin Local Plan contains little reference to the significance of the canal network. There is no reference either within the Local Plan document or in the Proposals Map to the path of the disused Shrewsbury & Newport Canal (other than an oblique reference to the Newport Canal in Appendix E of the Plan in relation to the Newport SSSI which extends along the full length of the canal in Newport). However, since this stretch of the canal is already 'in water' the relevance of the SSSI in relation to restoration is purely academic.

There is however a somewhat apologetic paragraph within the text which states:-

'4.3.2.8 Telford has historically been home to various canal routes. Many of these have now undergone a process of blending into the landscape. It is recognised that the reinstatement of the canals could deliver additional visitors to the area. There are many barriers to the restoration of the borough's old canals, however schemes which relate to their restoration will be considered on their individual merits'.

This paragraph was added since the Consultation Draft and displays a paucity of knowledge about the canal network within Telford, but the Council has still

resisted suggestions both by the Shrewsbury & Newport Canal Trust and other representors, including ourselves, to safeguard the route of the canal, and offers no active support or encouragement to restoring the canal.

The Telford & Wrekin EIP.

During the debate on Matter 4: 'Economy' at the Telford & Wrekin EIP, the Council strongly resisted suggestions from the Shrewsbury & Newport Canal Trust that the route of the canal should be safeguarded and instead fielded a 'battery' of officers (including an engineer brought out of retirement) to challenge the feasibility of the canal restoration project – which has been previously surveyed, investigated, costed and in fact is already well underway. (The Inspector, in a somewhat jocular fashion, asked during the EIP whether all infrastructure projects were likely to receive the same level of scrutiny).

During the hearing session, there was some doubt about whether the canal was a 'heritage asset' and if so what is its status. The Inspector asked the Council to indicate whether the Shrewsbury to Newport Canal is indeed a non-designated heritage asset and also to devise a form of words to secure the safeguarding of the canal route – to constitute potential Proposed Modifications to the plan.

The Council has now submitted its formal response to this request in the form of Document K24/14a.

Non-designated and designated heritage assets.

The Council has referenced the HER records provided by Shropshire Council which show that the two separate parts of the Canal (from Shrewsbury to Wappenshall and from Wappenshall to Norbury Junction) are both categorised as heritage assets. The HER citations include a long list of related structures, many of which are recorded as 'Ancient Monuments' in their own right. These monuments (including for example the Longden on Tern Aqueduct – the first iron aqueduct in the world, the Ditherington Flax Mill building in Shrewsbury – the first iron framed building in the world – and the Wappenshall Canal Bridge) were all constructed as a direct consequence of the building of the canal. Without the canal, they would not exist.

The Council concludes within paragraph 6 of their statement that the route of the canal is **not** a 'non-designated heritage asset'. This contradicts the evidence within the HER records and flies in the face of common sense. If the canal were not a heritage asset, it would undermine the value and significance of all the designated heritage assets along the route some of which are of world significance.

In terms of the Council's obligations to promote and protect its heritage assets, paragraph 7 of the Council's statement K24/14a presents a selective interpretation of Government policy. Paragraph ID 18a-006-20140306, which the Council quotes, states '*Whilst there is no requirement to do so, LPA's are 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'. Guidance within ID18a-004-201403036 instructs LPA's to produce a positive policy for the conservation and enjoyment of the historic environment and emphasises that this is not a passive exercise.

Whilst the Council is correct that Policy BE8 provides appropriate measures to safeguard the archaeology and scheduled ancient monuments within the Borough as a last resort, it is surely the Council's role to take a more pro-active stance to promote and protect those heritage assets within their wider context – in other words, to encourage the protection and restoration of buildings, bridges and aqueducts both individually and against the context of the canal within which they lie.

Safeguarding the canal.

The Council argues that the question of safeguarding the canal is not a matter of 'soundness'. I disagree. The Council has an obligation to plan positively and to protect and promote its heritage assets. It is difficult to see how this can be done adequately without recording the path of the canal (with the various recorded heritage assets along it) as a reference point.

I would also disagree with the Council that the Trench and Humber Arms of the canal should not be safeguarded. It is equally important that canals on the edge of the designated area of Telford should be preserved in addition to the Shrewsbury & Newport Canal. Sadly, in the past the Council has allowed older canals within the Telford Development Area to be built over and lost for ever (as paragraph 4.3.2.8 acknowledges), when with careful planning it would have been possible to incorporate those canals within new development and thus preserve their heritage. The Trench Inclined Plane, for example, is now simply a dual carriageway due to negligence by the authority in the past, (although the position of the structure can still be detected and photographic records of the Inclined Plane are still to be seen in the Blue Pig pub at the foot of the former Inclined Plane).

The Council's emphasis on environmental protection should not constrain the protection of the heritage asset – the two are entirely compatible.

Potential Safeguarding Policy.

The proposed Safeguarding Policy presented within Paragraph 11 of the Council's paper K24/14a is disappointingly negative and completely inadequate. The second paragraph, in particular, presents the restoration of the canal in a negative context, viewing it as an initiative which will have detrimental impact on natural and heritage assets which is misleading, rather than a positive ambition to improve the Borough. This conflicts with the requirement for the Local Plan to be 'positively prepared'.

Similarly, the third paragraph relating to canal-side and enabling development is strangely negative and fails to anticipate the benefits which development

can bring to help restore sections of canal, encourage tourism, improve the landscape, boost the local economy and attract much needed housing. There appears to be a complete lack of imagination about how heritage and water-based development can combine to promote enhanced standards of design and layout and facilities within Telford along the lines of the video 'Water Adds Value' which has been shown to the Council.

Paradoxically, the Shrewsbury & Newport Canal Trust has long been supported by senior Council members (often the Mayor) who have regularly attended SNCT AGM's and welcomed the volunteer work of its members in trying to restore the canal for the benefit of the whole Borough.

Other exemplar authorities.

Other authorities tend to take a much more pro-active stance in supporting the voluntary effort of canal restorers in bringing waterways back into use. In Wychavon for example, the Droitwich Canal has only recently been re-opened creating an important new usable heritage asset and linking key arms of the canal network, thus boosting tourism and the local economy.

In South Staffordshire, a simple policy securing the protection of the canal route of the Lichfield and Hatherton Canal, ensures that the Council is seen as taking a pro-active role in assisting the restoration of that canal.

In Shropshire the ambition to restore the Shrewsbury & Newport Canal is acknowledged within the Shropshire Core Strategy (paragraph 6.36) albeit the Plan recognises that this may not be achieved within the Plan period. The Shrewsbury & Newport Canal is also identified as an Environmental Asset within the Plan. Furthermore, in Policy MD11 of the Site Allocations Plan (SAMDEV), the scope for tourist facilities and marinas linked to the restoration of canals are supported.

Conclusions.

It is hard to comprehend why the Council has adopted quite such a negative stance towards the restoration of its own heritage assets, especially when their own Council members regularly express support for the initiative. The Council's current stance clearly conflicts with two key tests of soundness insofar as the Local Plan as written is not positively prepared nor is it properly justified. In order to become 'sound' it therefore needs to be changed through modifications to reflect these deficiencies.

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