

Ref	Consultee	Comment
1	Canal and River Trust	<p>We are the charity who look after and bring to life 2000 miles of canals &amp; 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 &amp; River Trust (the Trust) is a statutory consultee in the Development Management process, and as such we welcome the opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded and enhanced within an appropriate policy framework.</p> <p>The Trust have no waterways, assets or land interests within the area covered by the document and as such we have no detailed comments to make. However, it is noted that the route of the Herefordshire and Gloucestershire Canal runs through the plan area. This canal is being actively restored by the Herefordshire &amp; Gloucestershire Canal Trust (HGCT). Please ensure that they are aware of the proposed Neighbourhood Plan and give the opportunity to comment. One of the Canal &amp; River Trust's charitable objects is to support the restoration of the inland waterways network as we believe life is better by water.</p> <p>It is noted that Table 1: Assessment of the Dymock Neighbourhood Development Plan objectives against NPPF goals mentions the canal in relation to the promotion of the development of a footpath/cycle track along the line of the Herefordshire and Gloucestershire canal towpath enhancing connectivity between Dymock, Ledbury and Newent.</p> <p>Whilst related to Canal &amp; River Trust owned canals, the attached document may be of assistance to the Neighbourhood Plan Steering Committee &amp; Dymock Parish Council in understanding other ways in which the canal route can be of benefit to the plan area as the plan progresses.</p>
2	C Tweedale	<p>There are several references to resisting changes to land used to run businesses.</p> <p>I would like to make the point that market forces, particularly in rural areas, determine the profitability and</p>

		<p>sustainability of businesses. For instance the house next door to us is called "The Shop" as it was the village shop until the 1970s and we live across the road to "The Old Stores" which has a similar history. No planning consent was ever needed to change the nature of this land use. It seems to me that planning policy should not be used to attempt to force rural areas to maintain a future as people wished it to be in the past. Planning policy must recognise that economic needs change over time. This is particularly so with modern IT Technology when people are working and running businesses from residential as well as properties designated for commercial use. Businesses come and go.</p>
3	The Coal Authority	<p>The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>Our records indicate that within the Neighbourhood Plan area there are recorded coal mining features present at surface and shallow depth including; a mine entry and probable coal workings. Where present these features may pose a potential risk to surface stability and public safety.</p> <p>It is noted however that the Neighbourhood Plan does not propose to allocate any new sites for development and on this basis the Planning team at the Coal Authority has no objections to, or specific comments to make on, the consultation document.</p>
4	E Slee	<p>This appears to be an excellent Neighbourhood plan. Very well researched and comprehensive. Thank you to the Dymock community.</p> <p>As a first comment for this plan and for the planning within Gloucestershire, the community infrastructure and the local facilities should certainly be safeguarded, but with new building it is VITAL that facilities be ENHANCED as well, to the full extent of the new building, whether that is 20 houses or 200 or 2000.</p> <p>Secondly, high speed broadband is expensive for households, unlike walking to the shop, doctor or post office. Not everyone is able to use the internet, however fast, because of poverty, disability of some kind, or simply being older and less savvy with dealing with computers and all the threats they pose, including scams. Health services in particular are not positive when not conducted in person.</p>

5	Environment Agency	We do not offer detailed bespoke advice on policy but advise you ensure conformity with the local plan and refer to guidance within our local NDP proforma guidance (copy enclosed, February 2024). I have also enclosed a copy of our 'Area Climate Change Guidance' (March 2023), which is referenced in the proforma guidance.
6	Gloucestershire County Council	We have no further comments to make with regards to the consultation. Thank you.
7	Herefordshire and Gloucestershire Canal Trust	The Herefordshire and Gloucestershire Canal Trust support the inclusion of the canal with in this NDP and look forward to working with the local Parish Council, Local Land owners and the general public in moving the restoration of the canal forward.
8	Historic England	I can confirm that there are no issues associated with the Plan upon which we wish to comment.
9	Malvern Hills National Landscape	<p>As a reminder, the Malvern Hills National Landscape is designated an Area of Outstanding Natural Beauty (AONB). Paragraph 182 of the <a href="#">National Planning Policy Framework (December 2023)</a> outlines the 'great weight' to be given to the conservation and enhancement of landscape and scenic beauty of designated AONBs, which has the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations. The scale and extent of development within the National Landscape should be limited, whilst development in its 'setting' should be sensitively located and designed to avoid or minimise adverse impacts on the designated AONB (our emphasis underlined).</p> <p>Policy BDP2 of the <a href="#">Malvern Hills AONB Management Plan 2019-2024</a>, itself a statutory plan and a material planning consideration in decision-making, states that "development in the AONB and its setting should be in accordance with good practice guidance including that produced by the AONB Partnership". Our guidance and position statements are freely available to assist those considering development in the National Landscape and its setting: <a href="https://www.malvernhills-nl.org.uk/our-work/planning/guidance-documents/">https://www.malvernhills-nl.org.uk/our-work/planning/guidance-documents/</a> and <a href="https://www.malvernhills-nl.org.uk/consultations/">https://www.malvernhills-nl.org.uk/consultations/</a>.</p> <p>The reasoned justification for our comments is explained in the legislation above but is done so to provide a further layer of protection to the Neighbourhood Development Plan in respect of being</p>

		<p>also consistent with Paragraph 182 of the NPPF. Policy LWPI of the AONB Management Plan states to <i>“Produce and adhere to community-led plans, strategies and statements (such as Neighbourhood Development Plans) that conserve and enhance the natural beauty of the AONB and encourage and maintain the vitality and diversity of rural community life.”</i> The Malvern Hills AONB Management Plan aims to be complementary to the current structure of frameworks, strategies and plans. However, its task is also to set out specific objectives and policies that help to maintain the integrity of the designated AONB as a clearly defined area of national landscape importance.</p> <p>The emerging NDP consultation documents make little reference to the AONB designation, despite the fact that much of the Neighbourhood Area/parish could be reasonably considered to contribute to the ‘Setting’ I of the Malvern Hills National Landscape, depending on the type of development being proposed, also lies within an area of soft, rolling landscape with open views towards the Malvern Hills in many parts of the Neighbourhood Area. Establishing this context, it is identified within the emerging NDP that a positive aspect of living in the Neighbourhood Area is <i>“The tranquil and rural character of the Neighbourhood Area with particular reference to the beautiful countryside, footpaths, cycle routes, wild daffodils, views, woodlands”</i> and a key aim is <i>“to protect the Neighbourhood Area from inappropriate development by ensuring that all development enhances the rural and historic distinctiveness of the area.”</i></p> <p>This very much aligns with one of the ‘Special Qualities’ of the Malvern Hills National Landscape, as identified within the Malvern Hills AONB Management Plan is <i>‘Dramatic scenery and spectacular views arising from the juxtaposition of high and low ground’</i> (refer to Page 9 of the Management Plan). Special Qualities are those aspects of the area’s natural beauty, wildlife and cultural heritage, that make the area distinctive and are valuable, particularly at a national scale.</p> <p>Since 2012, Defra and Natural England have advised those carrying out management plan reviews to consider the effect of development in the setting of protected landscapes. It is common to express the extent and importance of setting in terms of views and vistas. Views are a crucial component of setting, being associated with the visual experience and aesthetic appreciation of the wider landscape. Views are particularly important in the Malvern Hills National Landscape. This is because of the</p>
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		<p>juxtaposition of high and low ground and the fact that recreational users value them so highly.</p> <p>Without careful management and planning, views and the broader setting of the National Landscape may be lost or degraded. The way people experience the designated AONB in its setting is also influenced by other environmental factors; by spatial associations; and by an understanding of the cultural relationship between sites and places, which the NDP partly recognises, but could go further on.</p> <p>Construction of a distant but high structure and any development or change generating movement, noise, odour, artificial light, vibration or dust over a wide area, particularly in its setting, can reduce the biodiversity and degrade the sense of remoteness and tranquillity experienced within the National Landscape. This would diminish the area's special qualities.</p> <p>We therefore consider given that much of the eastern portion of the Neighbourhood Area lies within the 'Setting' of the Malvern Hills National Landscape, and that a number of policies can be expanded upon policies to ensure that consideration is given to avoiding adverse harm to 'natural beauty' of the Malvern Hills National Landscape, due to the proximity of the National Landscape, as a result of the topography, visual and landscape sensitivities of the Neighbourhood Area.</p> <p>We suggest adding the following wording to Policies HM2, HM2a, HM2b, HM2c, NE2, E2, BE3 and TMI: <i>"Where developments are considered to be located within the Setting of the Malvern Hills National Landscape, they conserve and enhance the 'Natural Beauty' and Special Qualities of the Malvern Hills National Landscape, which is designated as an Area of Outstanding Natural Beauty, particularly taking into account views both into and from the National Landscape"</i>.</p> <p>Policy NE4 can also make reference to the Malvern Hills National Landscape Guidance on Lighting which has recently been revised - <a href="https://www.malvernhillshills.org.uk/wp-content/uploads/2024/02/Lighting-Guidance-FINAL-TEXT.pdf">https://www.malvernhillshills.org.uk/wp-content/uploads/2024/02/Lighting-Guidance-FINAL-TEXT.pdf</a></p> <p>As a point of principle and given our experiences of other NDPs we have commented in both within the National Landscape and its Setting, we encourage the NDP steering group consider making provision for an allocated site within the settlement boundary, to avoid</p>
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		<p>engaging Paragraph 14 of the NPPF and possible speculative applications outside the defined settlement boundary. This may provide further protecting in avoiding possible speculative applications which may lead to adversely harming the Malvern Hills National Landscape and its Setting, especially at Land at Beach Lane, Bromsberrow Heath.</p> <p>Section 85 of the Countryside and Rights of Way Act 2000, as a result of the Levelling Up and Regeneration Act (2023), now states,  <i>“In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty”</i></p> <p>We trust the above will be taken into account in strengthening the already excellent work which has been undertaken to date. We wish the Neighbourhood Area well in progressing to Examination and beyond although should you wish to discuss comments further, please do not hesitate to make contact.</p>
10	National Gas	<p><b>About National Gas Transmission</b>  National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK’s four gas distribution networks where pressure is reduced for public use.</p> <p><b>Proposed sites crossed or in close proximity to National Gas Transmission assets:</b>  An assessment has been carried out with respect to National Gas Transmission’s assets which include high-pressure gas pipelines and other infrastructure.</p> <p>National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.</p> <p>National Gas Transmission provides information in relation to its assets at the website below.  • <a href="https://www.nationalgas.com/land-and-assets/network-route-maps">https://www.nationalgas.com/land-and-assets/network-route-maps</a></p> <p>Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure.</p> <p><b>Distribution Networks</b></p>

		<p>Information regarding the gas distribution network is available by contacting: <a href="mailto:plantprotection@cadentgas.com">plantprotection@cadentgas.com</a></p> <p><b>Further Advice</b> Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets.</p>
11	National Highways	National Highways has no comments.
12	Newent Civic Society	<p>1. Dymock is undoubtedly a unique area, its history spanning over a thousand years. Its NDP is totally focussed on its history and built environment, showing little to substantiate its desire towards improving facilities and developing its community within the confines of its Conservation Area, the Parish Boundary and the period of this NDP.</p> <p>2. Throughout the NDP, other than a proposal to re-purpose and reuse existing buildings, there appears a reluctance to include and support new areas for development to support the stated needs of their valued community: this needs to be addressed moving forward. This is considered key as the Development Plan only addresses the period 2024 to 2026: it needs to look beyond 2026.</p> <p>3. Albeit reference is made to a significant number of key national supporting documents, (DLUHC and MHCLG), those relating to the Local Plan, Ref 2012 FoD Local Plan and the 1998 Residential Design Guide require revisiting in-line with latest national development proposals and standards.</p> <p>4. While recognising the drive towards Dymock's enhancement of local environmental standards, the reduction in carbon emissions and improved housing standards, one needs to be accepting of realistic local compromises - it is a rural Parish community comprising low density, outlying hamlets, and such a balance of compromise needs to be included within the NDP.</p> <p>5. To summarise, the NDP should include a series of controlled development options, far beyond that being considered of just enhancing community needs should Dymock and its surrounding hamlets, develop and have and secure, a truly sustainable future.</p>
13	Tufnell Town and Country Planning	<p>1. The DNDP has unfortunately been prepared at a time when FODDC cannot demonstrate a 5-year housing land</p>

		<p>supply, and as a result is “out of date”<sup>1</sup>. This has knock on implication for the DNDP, and indeed any NDP. The NDP is required to be in general conformity with the existing Development Plan (Core Strategy and Allocations Plan) and is therefore constrained. On the one hand, the NDP cannot e.g. deviate from the Defined Settlement Boundaries of the DP, yet on the other, it needs to do so in order to assist in the delivery of necessary and required housing.</p> <p><b>2.</b> The plan has also been prepared at a time when FODDC does not have a suitable supply of self-build plots. The Plan should give suitable encouragement for self-build, in accordance with the direction of travel of National Policy, recent legislative clarifications should be accounted for, and the Plan should not rely on FODDC data regarding settlement preferences.</p> <p><b>3.</b> The Plan should not rely on base data which is more than 5 years old.</p> <p><b>4.</b> The Plan should be reviewed and corrected to ensure that its references to e.g. National Policy are up to date (Note: e.g. NPPF-December 2023).</p> <p><b>5.</b> There is a lack of clarity between terms “designated green space”; local green space”; “open spaces”; and “important open areas”. Some of these terms (e.g. local green space) have specific meaning in legislation and national policy. Care needs to be taken that any allocations are not in conflict with National Policy and Case Law. Justification for the IOA approximating with the former railway line/canal route (page 63) requires proper justification. In our opinion the “allocation” does not meet required criteria. It is not sufficient to rely on the out-of-date AP. Comparison with Green Belt policy (pages 62 &amp; 65) is inappropriate.</p> <p><b>6.</b> I request to be notified of the Forest of Dean District Council's decision under Regulation 19 to make or refuse to make the neighbourhood development plan.</p>
14	Sport England	<p>Government planning policy, within the <b>National Planning Policy Framework (NPPF)</b>, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of</p>

<sup>1</sup> All FODDC DP polices impacting on the supply of housing land will be deemed out of date.

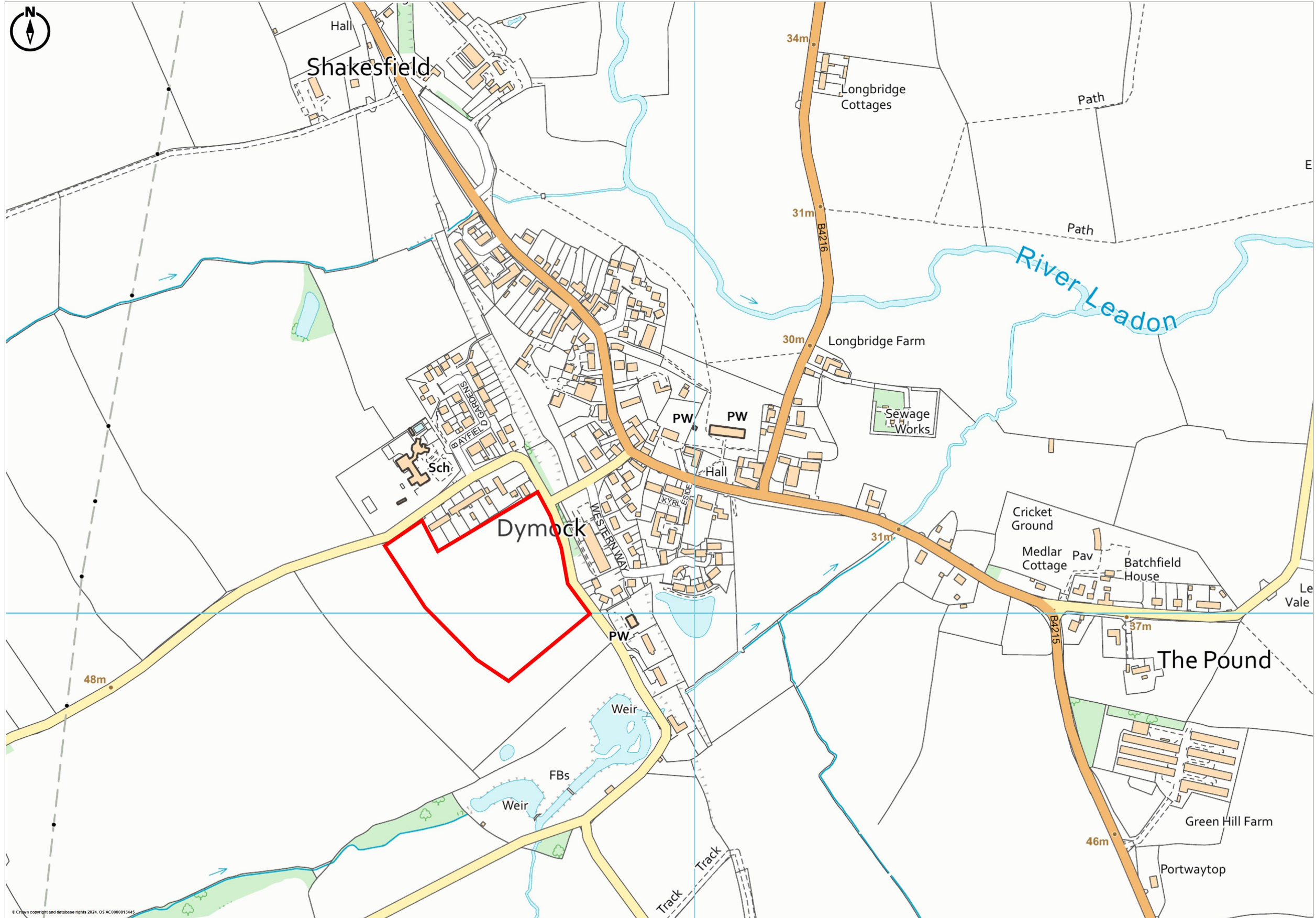


		<p>the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>Therefore, it is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 102 and 103. It is also important to be aware of Sport England’s statutory consultee role in <b>protecting playing fields</b> and the presumption against the loss of playing field land. Sport England’s playing fields policy is set out in our Playing Fields Policy and Guidance document.</p> <p><a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-forsport#playing_fields_policy">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-forsport#playing_fields_policy</a></p> <p>Sport England provides guidance on <b>developing planning policy</b> for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.</p> <p><a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-forsport#planning_applications">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-forsport#planning_applications</a></p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 103 of the NPPF, this takes the form of <b>assessments of need and strategies for indoor and outdoor sports facilities</b>. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p>
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		<p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.</p> <p><a href="http://www.sportengland.org/planningtoolsandguidance">http://www.sportengland.org/planningtoolsandguidance</a></p> <p>If <b>new or improved sports facilities</b> are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.</p> <p><a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</a></p> <p>Any <b>new housing</b> developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how <b>any new development</b>, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the</p>
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		<p>evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: <a href="https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthycommunities">https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthycommunities</a></p> <p>PPG Health and wellbeing section: <a href="https://www.gov.uk/guidance/health-and-wellbeing">https://www.gov.uk/guidance/health-and-wellbeing</a></p> <p>Sport England's Active Design Guidance: <a href="https://www.sportengland.org/activedesign">https://www.sportengland.org/activedesign</a></p>
15	Powells	<p>We are writing to submit a proposed Candidate Site for consideration within the Dymock Parish Neighbourhood Development Plan (NOP) Regulation 14 Consultation on behalf of our clients as the freehold owners of Station Field. Our client's site is located on the south-western edge of the village, immediately south of the Ann Cam C of E Primary School, and we believe it presents a unique opportunity to contribute positively to the local community's growth and development needs.</p> <p><b>Site Description and Potential</b>  The site encompasses an area that, following preliminary assessments, could accommodate approximately 20 - 25 dwellings. This estimation is subject to further detailed technical assessments to ensure a development that is sensitive to and harmonious with the local environment and community needs. The site's proximity to the village primary school and the core of the village positions it as an ideal location for family housing, enhancing the community's cohesion and accessibility to local amenities.</p> <p><b>Compliance and Constraints</b>  It is important to note that our preliminary evaluations indicate that the site is not subject to any constraints that would prevent its development. We are committed to conducting a thorough analysis to address all planning, environmental, and community considerations, ensuring the project's viability and compliance with local and national planning policies.</p> <p><b>Community Engagement and Benefits</b>  The owners of the site are keenly interested in engaging with the Dymock Parish Council and the wider community to ensure that the development meets the village's needs. We believe that by working</p>

		<p>collaboratively. we can deliver a residential project that not only provides new homes but also supports local infrastructure, enhances social inclusion, and contributes to the village's long-term sustainability.</p> <p>Our proposal aims to address the growing demand for affordable housing in Dymock, offering a range of dwelling types to accommodate diverse community needs. Moreover, we are open to discussing how the development can integrate affordable housing units, support local biodiversity enhancements, and contribute to the village's social and economic vitality.</p> <p><b>Conclusion and Next Steps</b> We respectfully request that the Dymock Parish Council consider our site as a candidate for potential allocation within the NDP for residential development. We are prepared to provide further information, engage in detailed discussions, and participate actively in the consultation process. Our goal is to achieve a development that reflects the community's aspirations, addresses its needs, and enhances the quality of life in Dymock.</p> <p>We enclose with this letter a plan setting out the proposed boundary of the candidate site.</p>
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# Neighbourhood Planning

## Environment Agency consultation guide/pro-forma

Version 8, February 2024

The Environment Agency aims to reduce and protect against flood risk, whilst protecting and enhancing the water environment, land, and biodiversity. To assist us in the West Midlands Area in providing the most focused and accurate consultation responses through the Neighbourhood Planning process we have produced the below guidance and pro-forma for you to consider, complete and return to Forest of Dean District Council.

You may wish to also refer to the [Neighbourhood planning - GOV.UK \(www.gov.uk\)](https://www.gov.uk) guidance to assist you in the preparation of your Plan.

The Environment Agency, along with Natural England, Historic England, and the Forestry Commission (now known as Forestry England), has also produced some national guidance which offers further environmentally specific information in the context of Neighbourhood Planning and gives ideas on incorporating the environment into Plans. The guidance is available at: [How to consider the environment in Neighbourhood plans](#).

In the context of Climate Change there is further information on writing a low-carbon Neighbourhood Plan available at: [How to write a neighbourhood plan in a climate emergency](#).

To compliment the above we have produced the following guidance to assist you in the West Midlands Area specifically. This takes you through some of the relevant environmental issues your community should consider when producing a Neighbourhood Plan. We recommend completing the pro-forma to check the environmental constraints specific to your Plan area, which should help identify challenges, inform evidence and policy, and assist delivery of sustainable solutions. This approach will help ensure you have a robust Plan.

**Flood Risk:** Your Plan should conform to national and local policies on flood risk. National Planning Policy Framework (NPPF) – Paragraph 165 states that ‘Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere’.

With reference to the Forest of Dean Core Strategy it is important that your Plan is in accordance with Policy CSP.1 - Design and environmental protection and the associated text.

[Core Strategy Adopted Version \(fdean.gov.uk\)](https://fdean.gov.uk)

If your Plan is proposing sites for development you should check whether any of the proposed allocations are at risk of river or tidal flooding based on our Flood Map (of modelled flood risk). For example, are there any areas of Flood Zone 3 or 2 (High and Medium Risk). In line with National Planning Policy and, specifically, the Sequential Test, you should aim to locate built development within Flood Zone 1, the low-risk Zone. Our **Flood Map** can be accessed via the following link: [Check the long term flood risk for an area in England - GOV.UK \(www.gov.uk\)](#)

In addition to the above you should also check with the Council’s Planning Policy Team with regards to other sources of flooding (such as surface water, groundwater, sewers, and historic flooding) as detailed in their Strategic Flood Risk Assessment (SFRA). Gloucestershire County



Where it is determined that new development should be behind a flood defence financial contributions may be sought to maintain or improve the structure.

**Waste Water Infrastructure:** Waste water infrastructure is also of importance in your Plan. Where housing is proposed you should use the pro-forma to identify the receiving treatment works and whether the housing and/or any employment growth can be accommodated without impacting the receiving treatment works. You should look at physical capacity issues (e.g. network pipes) and environmental capacity (quality of treated effluent) issues. In addition you should contact the Water Company for further advice.

Where there is an identified constraint (amber or red) you should demonstrate that there is a solution (it may be already programmed or could be a possible future infrastructure upgrade) to help improve the capacity issue and enable the development to go ahead. This will require consultation with the Water Company, and we have developed some general questions to assist this process. The outcome of this may inform a 'phasing' policy within your plan where appropriate. It may also be necessary to produce an 'Infrastructure Delivery Plan' to set out any key milestones for wastewater infrastructure upgrades and improvements. The evidence you produce should give a reasonable degree of certainty to all parties, helping demonstrate development is deliverable, and importantly ensure that your plan is 'sound'.

Note: Government Guidance states that sufficient detail should be provided to give clarity to all parties on when infrastructure upgrades will be provided, looking at the needs and costs (what and how much). The NPPG refers to "ensuring viability and deliverability – pursuing sustainable development requires careful attention to viability and costs in plan making and decision making". Plans should be "deliverable".

We would recommend discussions with the Utility Company to ascertain how you can progress with your Plan without impact on the works. To assist in these discussions, we would recommend the following:

- What solutions are programmed within Asset Management Plans (AMP)? When will these solutions be delivered? Are there any options for accelerating these schemes via developer contributions?
- In the absence of any improvement schemes what could alternative solutions be (type and location of) for short/medium/long term growth. Are these solutions cost prohibitive?
- Are there any short-term options to facilitate growth? Some options to consider could be SUDS retrofitting or removing surface water from sewer systems.

Utility companies could be asked about what Water Framework Directive (WFD) work they already have programmed into their AMP Schemes for Phosphate stripping or other sanitarities (e.g. ammonia/Biological Oxygen Demand).

- With reference to the Nutrient Management Plan (where this is relevant), and Phosphate specific issues, are there any stringent measures factored in to ensure no environmental deterioration? What improvement scheme is, or could be, in place to bring forward development?

**Water Management and Groundwater Protection:** In February 2011, the Government signalled its belief that more locally focussed decision making, and action should sit at the heart of improvements to the water environment. This is widely known as the catchment-based approach and has been adopted to deliver requirements under the Water Framework Directive (WFD). It seeks to:

- deliver positive and sustained outcomes for the water environment by promoting a better understanding of the environment at a local level; and



- encourage local collaboration and more transparent decision-making when both planning and delivering activities to improve the water environment.

Neighbourhood Plans provide an opportunity to deliver multi-functional benefits through linking development with enhancements to the water environment. Local WFD catchment data can be obtained from: [River Basin Catchment Data Explorer](#).

The Forest of Dean District and the Severn and Wye Catchments, fall within the Severn River Basin Management Plan (SRBMP) area and the document highlights key issues and actions for the Severn catchment that should be of use in developing your Neighbourhood Plan. The latest SRBMP was approved in February 2016 (available at <https://www.gov.uk/government/collections/river-basin-management-plans-2015>). Further details are at: <https://www.catchmentbasedapproach.org/severn>

**Aquifers and Source Protection Zones (SPZs):** Some of your local area, and specific potential site allocations, may be located upon or within aquifers and Source Protection Zones (link below). SPZ 1 is especially sensitive. You might consider these within your Plan and when allocating sites. The relevance of the designation and the potential implication upon development proposals should be seen with reference to our Groundwater Protection Position Statements: <https://www.gov.uk/government/publications/groundwater-protection-position-statements>

Development and surface water drainage will need to be carefully located and designed to avoid pollution risks to waters and address potential environmental impact associated with low flows. For example SuDS may need to provide multiple levels of treatment. To address any quantitative issues with the waterbodies, SuDS should be designed so as to maximise recharge to the aquifer and support water levels in receiving rivers.

**Water Efficiency at Neighbourhood Plan Level:** Local Water Efficiency targets may be secured in a neighbourhood plan or higher-level local plan policy. The draft Technical Standards – Housing Standards Review (Paragraph 14) provided advice on more stringent ('optional') water efficiency targets/measures, which go beyond the minimum building regulations standard. Paragraph 14 states that..."Neighbourhood Planning Bodies will only be able to apply the space standard and not optional requirements".

These standards have since been enshrined into the Building Regulations (part G) "*The optional requirement only applies where a condition that the dwelling should meet the optional requirement is imposed as part of the process of granting planning permission. Where it applies, the estimated consumption of wholesome water calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day*". However, there is no direct responsibility for Neighbourhood Plans to incorporate these water efficiency measures.

**Cemetery Allocations:** Allocations for cemeteries brought forwards within Neighbourhood Plans must consider their location in relation to Flood Zones, Source Protection Zones (Any Borehole, including private boreholes, for potable supply should be considered) and Type of Aquifer. We would offer comments primarily in relation to the protection of controlled waters (i.e. groundwater and surface water). Matters relating to human health should be directed to the Local Authority. If steps are not taken to reduce the risks, burials can present a risk to the water environment. The proposed burial ground will need to meet our minimum groundwater protection requirements as set out in the following document: [Protecting groundwater from human burials - GOV.UK \(www.gov.uk\)](#) .

**Biodiversity Net Gain:** Development of allocated sites offers the opportunity for Biodiversity Net Gain (BNG) as referenced in Paragraphs 180, 185 and 186 of the NPPF ‘Conserving and enhancing the natural environment’. Specifically, any ponds and flood storage areas if designed correctly could also provide opportunity for blue and green infrastructure, such as wetland habitat throughout the year as well as providing a recreation amenity.

Whilst we would not necessarily expect to see specific BNG details for allocations within the Plan, there may be an opportunity to promote ‘Net Gains’ within your Policies.

Please see [Biodiversity net gain - GOV.UK \(www.gov.uk\)](https://www.gov.uk) and [Biodiversity Net Gain for local authorities | Local Government Association](#) for further information.

### Neighbourhood Plan Environment Agency Pro-Forma

Site Allocation Description  e.g. name, type and number of units.	Flood Zone (3/2/1) *	Unmodelled river or ordinary watercourse in or adjacent to site	Other sources of flooding (e.g. SW, GW, SF)	Flood Defence	Aquifer/Source Protection Zone 1  (Description)	Environmental Capacity at Treatment Works (Red – potential showstopper, Amber – possible problem; or Green – likely to be no issues)
Example	2	Y	SW	N	N	Amber
		Y/N		Y/N	Y/N	
		Y/N		Y/N	Y/N	
		Y/N		Y/N	Y/N	
		Y/N		Y/N	Y/N	
		Y/N		Y/N	Y/N	
		Y/N		Y/N	Y/N	

**\*Note to above:** Flood Zone 3 is the high-risk zone and is defined for mapping purposes by the Environment Agency’s Flood Zone Map. Flood Zone 3 refers to land where the indicative annual probability of flooding is 1 in 100 years or less from river sources (i.e. it has a 1% or greater chance of flooding in any given year). Flood Zone 2 is land where the indicative annual probability of flooding is between 1 in 100 and 1 in 1000 years. Flood Zone 1 is the low-risk Zone with a flood risk in excess of 1 in 1000 years.

When considering ‘other sources of flooding’ you should refer to the SFRA and contact Forest of Dean District Council to ascertain whether the Parish, or specific allocated site, is impacted by surface water, groundwater, or sewer flooding etc. The team and/or the LLFA may also have historic flooding information to help inform your plan. More information on sewer flooding, or plans to remedy such, may be available from the Water Company.

**Produced by:** West Midlands Sustainable Places Team.

**Please contact us at:** [westmidsplanning@environment-agency.gov.uk](mailto:westmidsplanning@environment-agency.gov.uk)

# Flood Risk and Coastal Change

## Climate Change allowances for planning (West Midlands area)

March  
2023

The National Planning Practice Guidance refers to Environment Agency guidance on considering climate change in planning decisions which is available online: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

This has been updated and replaces the March 2016 guidance.

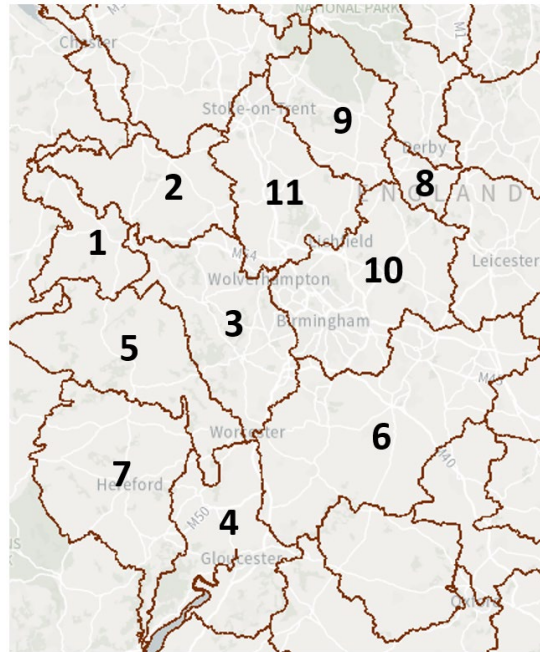
It should be used to help planners, developers and advisors implement the National Planning Policy Framework (NPPF)'s policies and practice guidance on flood risk. It will help inform Flood Risk Assessments (FRA's) for planning applications, local plans, neighbourhood plans and other projects.

### Fluvial flooding – peak river flows

NPPG advises that an allowance should be added to 'peak river flows' to account for 'climate change' which should be specific to a 'management catchment' and development type (vulnerability). To work out which management catchment allowances to use, you need to: access the climate change allowances for [peak river flow map](#)

In West Midlands area, we would refer you to the map extract on page 2 below. This outlines the '**peak river flows**' within the specific 'Management catchments' for the area including Severn River Basin District and Humber River Basin District and specifies the range of percentage allowances to reflect individual development's vulnerability and lifetime. The following allowances should be used:

Development Vulnerability	Allowance (lifetime)
Essential Infrastructure	Higher Central - 2080's
Highly Vulnerable and More Vulnerable (residential), and some Less Vulnerable (commercial, and non-residential development where a period of at least 75 years is likely to form a starting point for assessment (see <a href="#">NPPG</a> )	Central - 2080's
Water Compatible and temporary (shorter lifetime)	Central - 2050's



**Extract: Management Catchments within the Severn River Basin District and Humber River Basin District** - refer to interactive [peak river flow map](#) for more detail. The Environment Agency also provide these allowances in the [peak river flow climate change allowances by management catchment table](#) – you have to know your management catchment to get the information you need. (Allowances reflect the latest projections in UKCP18 and subsequent research that models how the latest rainfall projections are likely to affect peak river flows).

<b>1. Severn Uplands Peak River Flows</b>	<b>2020's</b>	<b>2050's</b>	<b>2080's</b>	<b>7. Wye Peak River Flows</b>	<b>2020's</b>	<b>2050's</b>	<b>2080's</b>
Higher Central	17%	24%	43%	Higher Central	19%	27%	49%
Central	13%	18%	33%	Central	14%	20%	37%
<b>2. Severn Middle Shrops Peak River Flows</b>	<b>2020's</b>	<b>2050's</b>	<b>2080's</b>	<b>8. Dove Peak River Flows</b>	<b>2020's</b>	<b>2050's</b>	<b>2080's</b>
Higher Central	20%	25%	44%	Higher Central	17%	24%	40%
Central	15%	18%	33%	Central	13%	18%	31%
<b>3. Severn Middle Worcs River Flows</b>	<b>2020's</b>	<b>2050's</b>	<b>2080's</b>	<b>9. Lower Trent and Erewash</b>	<b>2020's</b>	<b>2050's</b>	<b>2080's</b>
Higher Central	16%	21%	40%	Higher Central	18%	23%	39%
Central	12%	15%	30%	Central	13%	17%	29%
<b>4. Severn Vale Peak River Flows</b>	<b>2020's</b>	<b>2050's</b>	<b>2080's</b>	<b>10. Tame, Anker and Mease Peak River Flows</b>	<b>2020's</b>	<b>2050's</b>	<b>2080's</b>
Higher Central	20%	28%	53%	Higher Central	15%	17%	30%
Central	14%	19%	37%	Central	10%	11%	22%
<b>5. Teme Peak River Flows</b>	<b>2020's</b>	<b>2050's</b>	<b>2080's</b>	<b>11. Trent Valley Staffs Peak River Flows</b>	<b>2020's</b>	<b>2050's</b>	<b>2080's</b>
Higher Central	21%	33%	60%	Higher Central	19%	23%	39%
Central	16%	24%	45%	Central	15%	17%	29%
<b>6. Avon Peak River Flows</b>	<b>2020's</b>	<b>2050's</b>	<b>2080's</b>				
Higher Central	12%	14%	32%				
Central	7%	8%	21%				

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## Sea Level rise allowances

Table 3 of the guidance (extract below) indicates that net sea level risk is as follows (updated from the 2013 version).

Area of England	Allowance	2000 to 2035 (mm)	2036 to 2065 (mm)	2066 to 2095 (mm)	2096 to 2125 (mm)	Cumulative rise 2000 to 2125 (metres)
South West	Higher central	5.8 (203)	8.8 (264)	11.7 (351)	13.1 (393)	1.21
South West	Upper end	7 (245)	11.4 (342)	16 (480)	18.4 (552)	1.62

**Note - For sites utilising the Severn tidal model the above allowances should be considered and applied. As of August 2020, specific updated flood level data is now available for the 2096 to 2125 epoch based upon the Environment Agency's Tidal Severn model within the West Midlands area and will be provided where relevant as part of our Request For Information service; contact [Enquiries Westmids@environment-agency.gov.uk](mailto:Enquiries_Westmids@environment-agency.gov.uk)**

### Flood Risk Assessment considerations:

The design flood (1% flood level fluvial, or 0.5% tidal, plus climate change allowance) should be used to inform the sequential test, including appropriate location of built development; consideration of flood risk impacts, mitigation/enhancement and ensure 'safe' development.

#### Vulnerability classification

- Development classed as 'Essential Infrastructure' (as defined within Table 2 - Flood Risk Vulnerability Classification, Paragraph: 066 Reference ID: 7-066-20140306 of the NPPG) should be designed to the 'higher central' climate change allowance (2080).
- For highly vulnerable or more vulnerable development e.g. housing, and some less vulnerable e.g. commercial, the FRA should use the 'central' climate change allowance (2080), as a minimum, to inform impact and built in resilience.
- For water compatible e.g. sand and gravel workings, or some temporary (shorter lifetime) uses, the FRA should use the 'central' climate change allowance (2050), as a minimum, to inform impact and built in resilience.

#### Assessing off-site impacts and calculating floodplain storage compensation

The appropriate allowance to assess off-site impacts and calculate floodplain storage compensation depends on land uses in affected areas. Use the central 2080 allowance for most cases (including where more vulnerable or highly vulnerable is affected) but apply the higher central allowance when the affected area contains essential infrastructure.



## Modelling approach

- **Major Development:**

For 'major' development (as defined within The Town and Country Planning Development Management Procedure (England) Order 2015)\*, see definition note below, we would expect a detailed FRA to provide an appropriate assessment (hydraulic model) of the 1% with relevant climate change ranges.

There are two options:

Scenario 1 - Produce a model and incorporate relevant climate change allowances within your Management catchment area location.

Scenario 2 - Re-run an existing model and incorporate relevant climate change allowances as specified in the Management catchment area data.

- **Non Major Development:**

For 'non major' development, we would advise that a model is produced or existing model is re-run, similar to the above approach (Scenario 1 and 2). This would give a greater degree of certainty on the design flood extent to inform a safe development.

However, for 'non major' development only, in the absence of modelled climate change information it may be reasonable to utilise an alternative approach. To assist applicants and Local Planning Authorities we have provided some 'nominal' climate change allowances within the 'Table of nominal allowances' below. These should be considered as appropriate within any FRA. There are three additional options:

Scenario 3 - Where previous modelled data (for a variety of return periods) is available, you could interpolate your own climate change figure (see notes below).

Scenario 4 - Where the 1% level is available from an existing model add on the relevant 'nominal climate change allowance' provided in the 'Table of nominal allowances' below.

Scenario 5 - Establish the 1% level, for example using topographical levels (including LiDAR) and assessment of watercourse flow and nature and then add on the relevant 'nominal climate change allowances' provided in the 'Table of nominal allowances' below.

– \*Note: For definitions of 'major' development see 'Interpretation 2.—(1)', on page 5, at: [www.legislation.gov.uk/ukxi/2015/595/pdfs/ukxi\\_20150595\\_en.pdf](http://www.legislation.gov.uk/ukxi/2015/595/pdfs/ukxi_20150595_en.pdf)

## Table of Nominal Allowances

Watercourse	Central allowance (2050s)	Central allowance (2080s)
Upper Severn (1)	600mm	850mm
River Wye		
River Teme		
Lower Severn (1)	400mm	600mm
Urban areas of Stafford (2) Sandyford & Kingston Brooks		
River Churnet		
Upstream River Stour (Worcestershire) and tributaries (3)		
River Arrow & River Alne	200mm	400mm
River Avon (4)		
River Trent		
River Tame		
River Rea and tributaries		
River Cole		
Tributaries and 'ordinary watercourses' (5)	200mm	300mm

### Notes to above:-

1. The Upper Severn / Lower Severn boundary is taken as Bevere Weir, North of Worcester (National Grid Reference: SO8376859428). These do not directly relate to management catchments.
2. 'Urban Stafford' refers to the tributaries of the River Sow through the urban areas of Stafford. These watercourses are the Sandyford Brook and Kingston Brook.
3. 'River Stour (Worcestershire) and tributaries' refers to all watercourses in the River Stour catchment upstream of the confluence between the Smestow Brook and River Stour (National Grid Reference: SO8626685396). Downstream of this location, the 'tributaries and ordinary watercourses' nominals should be used.
4. Use of the 'River Avon' nominal is only valid upstream of the M5 crossing (National Grid Reference: SO9146836959) and downstream of this point, the 'Lower Severn' nominals should be used.
5. An 'Ordinary Watercourse' is a watercourse that does not form part of a main river. Main Rivers are indicated on our Flood Map. You can also check the classification of the watercourse with the LLFA, some of which have produced Drainage and Flooding Interactive Maps.

The 'Tributaries and ordinary watercourses' nominals should be used for all other watercourses that are not clearly defined within the table. Please note that we may hold more accurate data for some watercourses and recommend you request all relevant information via a data request to [Enquiries.Westmids@environment-agency.gov.uk](mailto:Enquiries.Westmids@environment-agency.gov.uk) Where we do hold up to date information, this should be used over the values given in this table.

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## 6. IMPORTANT NOTES

Where a site is near the confluence of two, or more, watercourses, the FRA should use the larger river climate change allowances.

We recommend that you contact us for our modelled '20%' allowances and associated flow data. This is available for some rivers. This data may help inform a more detailed climate change analysis (where necessary), including any interpolation of levels or flow to create a 'stage discharge rating' to estimate the required percentage; or be of assistance to inform some temporary or 'water compatible' development proposals.

Please note the nominal climate change allowances are provided as a pragmatic approach, for consideration, in the absence of a modelled flood level and the applicant undertaking a detailed model of the watercourse. The confidence of nominals may be lower for some smaller urban rivers and heavily culverted watercourses, but they are an indicative suggested allowance. In these situations, the applicant may choose to remodel and verify such. Use of nominal climate change allowances are not provided/recommended as a preference to detailed modelling and historical data.

The Local Planning Authority may hold data within their Strategic Flood Risk Assessment (SFRA), or any future updates, which may help inform the above.

### FREEBOARD NOTE

It is advised that Finished Floor Levels should be set no lower than '600mm' above the 1% river flood level plus climate change. Flood proofing techniques might be considered where floor levels cannot be raised (where appropriate). This 600mm freeboard takes into account any uncertainties in modelling/flood levels and wave action (or storm surge effects).

## Surface Water

The guidance also indicates the relevant surface water allowances that the FRA should consider, for an increase in peak rainfall intensity. The [peak rainfall allowances map](#) shows anticipated changes in peak rainfall intensity. Use '2050s' for development with a lifetime up to 2060 and use the 2070s epoch for development with a lifetime between 2061 and 2125.

Use these for site-scale applications (for example, drainage design), and for surface water flood mapping in small catchments (less than 5 square kilometres) and urbanised drainage catchments. A drainage catchment is urban if the land use is a town or city. If you are unsure if your catchment is urban or rural, please contact the [lead local flood authority](#).

For Development with a lifetime beyond 2100 e.g. residential, use 'upper end' allowances. For development up to 2060, and between 2060 and 2100, use the 'central' allowances. You should ensure development has no impact on surface water and is safe in the design event.

Note - For modelling large areas (larger than 5 square kilometres) with rural land use, direct rainfall modelling is unlikely to be appropriate and fluvial flood risk should be assessed using the [peak river flow allowances](#). Do not use the peak river flow allowances to adjust rainfall totals as they are not compatible.

**Produced by:** [WestMidsPlanning@environment-agency.gov.uk](mailto:WestMidsPlanning@environment-agency.gov.uk)

West Midlands Area - Sustainable Places Team.





# What your local waterway can do for your community

Planning for waterways in Neighbourhood Plans



Canal &  
River Trust





Canals and rivers can define the personality of a village, town or city, helping to explain the history of a location and what makes it special today. Local waterways can help make people's lives better by helping them live healthier and more sustainable lives, as well as improving local connectivity.

They provide open space on people's doorsteps, to use free of charge – somewhere to spend time with family and friends, to see wildlife, a traffic-free accessible route to work, a place to connect with the natural environment. When used to their full potential, waterways can change places for the better.

The Canal & River Trust (the Trust) is the charity that cares for 2,000 miles of canals and rivers across England and Wales. We are passionate believers in using the power of local waterways to transform places and enrich lives. We want to support local communities to secure and build on the multiple benefits that waterways bring, now and in the future. We believe that by working together we can deliver living waterways that transform places and enrich the lives of local communities. We want to encourage and support local communities and town and parish councils to champion their waterways in the planning process.

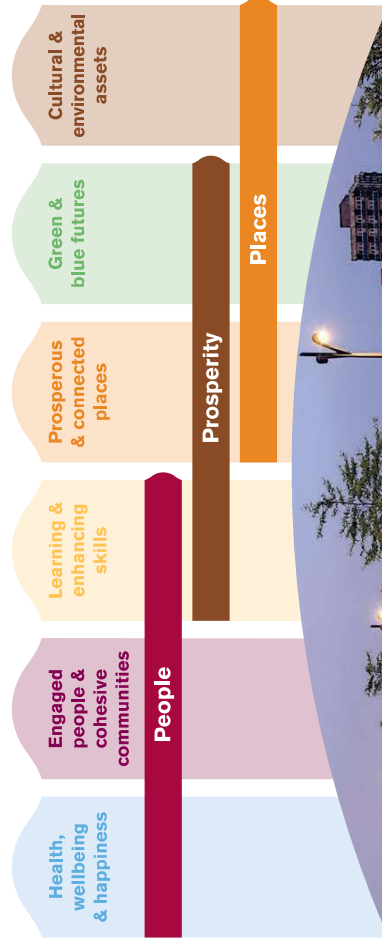
We only own around 4% of the land adjacent to our waterways, therefore influencing developments on this land is essential to develop and protect the places that local communities value and to create the types of places that can allow us to achieve our vision. In speaking up for waterways, local communities can complement our role as a statutory consultee in the planning process.

# Neighbourhood Plans

Local communities and town and parish councils in England have the power to prepare Neighbourhood Plans, setting out the policies that they want to apply when a planning application is submitted in their area. This can be a great opportunity to understand how waterways contribute to the character and life of your area and to shape how they'll do so in the future. This document sets out some issues and opportunities to consider when preparing a neighbourhood plan that considers the contribution of your waterway to community life.

# Waterway Benefits

Early in the process of preparing a plan, you may want to consider data and information available to help you. You may find our Open Data can assist. To demonstrate the breadth of our impact at both local and national level across a range of cross-cutting themes; how waterways relate to the different local communities we serve, and our contribution to the nation's wellbeing in its widest sense, the Trust is developing an Outcomes Measurement Framework (OMF). On the following pages, you will see how we believe that the delivery of thriving waterways through the planning system can drive the six inter-related outcomes shown below. In the future, we hope to be able to share evidence on these outcomes with local communities.





# Living Waterways:

**We work hard to ensure our waterways are safe to enjoy. We want them to be loved and used and to be the heart of community life, alive with people, boats, wildlife and activity.**

## Active Waterways

Boats are a key part of the character of our canals and rivers, bringing life, colour and vitality to the waterways. They can provide natural surveillance over the waterside, a market for waterside businesses and sometimes a place where people choose to live, where appropriate. Planning permission may be required for moorings in some circumstances. We encourage you to discuss any proposals that your plan may have to support these essential facilities.

## Biodiversity

Canals and rivers provide homes for all kinds of plants and wildlife. New development should help to protect and enhance these habitats, avoiding the spill of artificial light and providing complementary connected habitats.

## Structural Integrity

It's vital that the Trust is consulted on new developments that may involve the digging of foundations close to our waterways, imposing loads on waterway walls or risks causing a breach of the waterway. Not doing so risks damage to the waterways, third party property and a risk to life. We should be consulted on neighbourhood plans that allocate sites in the vicinity of our waterways.

## Water Quality & Resources

The quality of water in canals and rivers can affect how attractive they are as spaces for people to be on, in or alongside. It can also impact on the plants and wildlife that rely on it. Where a development might affect the amount of water available, for example a new marina, we need to ensure that it won't adversely impact our ability to maintain standards for navigation.

## Restoration

There are many local restoration groups supporting the restoration of canals in England and Wales. Neighbourhood Plans may be able to support this work by providing funding towards physical works, through the Community Infrastructure Levy, or by safeguarding the routes from development that would prevent the restoration. Our Local Plans: Delivering inland waterway restoration projects in England and Wales document provides more information on the role of planning in supporting restoration.

## Flooding

Canals and rivers can flood. It's important that new developments are appropriately located, designed to minimise risk and do not adversely affect our assets. We regularly provide information to local authorities to help them prepare Strategic Flood Risk Assessments, which you may want to check when preparing a neighbourhood plan.

## Navigation

The Trust is keen for waterways to be alive and to support a range of on-water uses but it's important that the ability of boats to navigate them safely is not compromised.





# Transforming Places:

**We want our canals and rivers to define the personality of a village or town, helping to explain the history of a location and what makes it special today.**

## Well-designed places

Waterways are not simply an attractive backdrop for buildings, they're important spaces of public realm and the relationship with them should be the starting point when designing new developments. Developments should engage with waterways and, where appropriate, open up access to, from and along them. Buildings that provide views over the waterway and include active uses (like shops or cafes) provide natural surveillance, helping people to feel safe when using the towpath or moorings.

## Heritage

The Trust is the custodian of one of the largest collections of industrial heritage. It's vital that new development protects, respects and enhances these assets so that they can continue to be enjoyed now and in the future.

## Sustainable Travel & Air Quality

Towpaths make excellent places for people to walk and cycle considerably. Not only is this great for recreation, it can be an attractive way for people to commute, reducing congestion, carbon emissions and poor air quality in the wider area and supporting people to lead healthier lives. There are also opportunities to use some waterways to transport freight, with some of the same benefits.

## Canal & River Trust land

There may be opportunities to develop land owned by the Trust to create better waterside places. Where a development is proposed by a 3rd party on the Trust's land, such as new bridges crossing our waterways or providing new utilities connections under the towpath, a commercial agreement will be required. The Trust's Code of Practice should be followed for works affecting our property.

## Improving waterside infrastructure

New development often brings new people onto the waterways, particularly the towpaths, which can result in a need to upgrade them. Historically, local authorities have decided what improvements to negotiate with developers. Town, parish and community councils and local communities now often have much more of a say. Where a local authority is charging the Community Infrastructure Levy (CIL), town, parish and community councils will get 15% of the receipts from developments in their area. In England, if the town or parish council adopts a Neighbourhood Plan they will get 25%. Where there is no town or parish council, local authorities charging CIL should determine spending priorities in consultation with local communities.

## Drainage

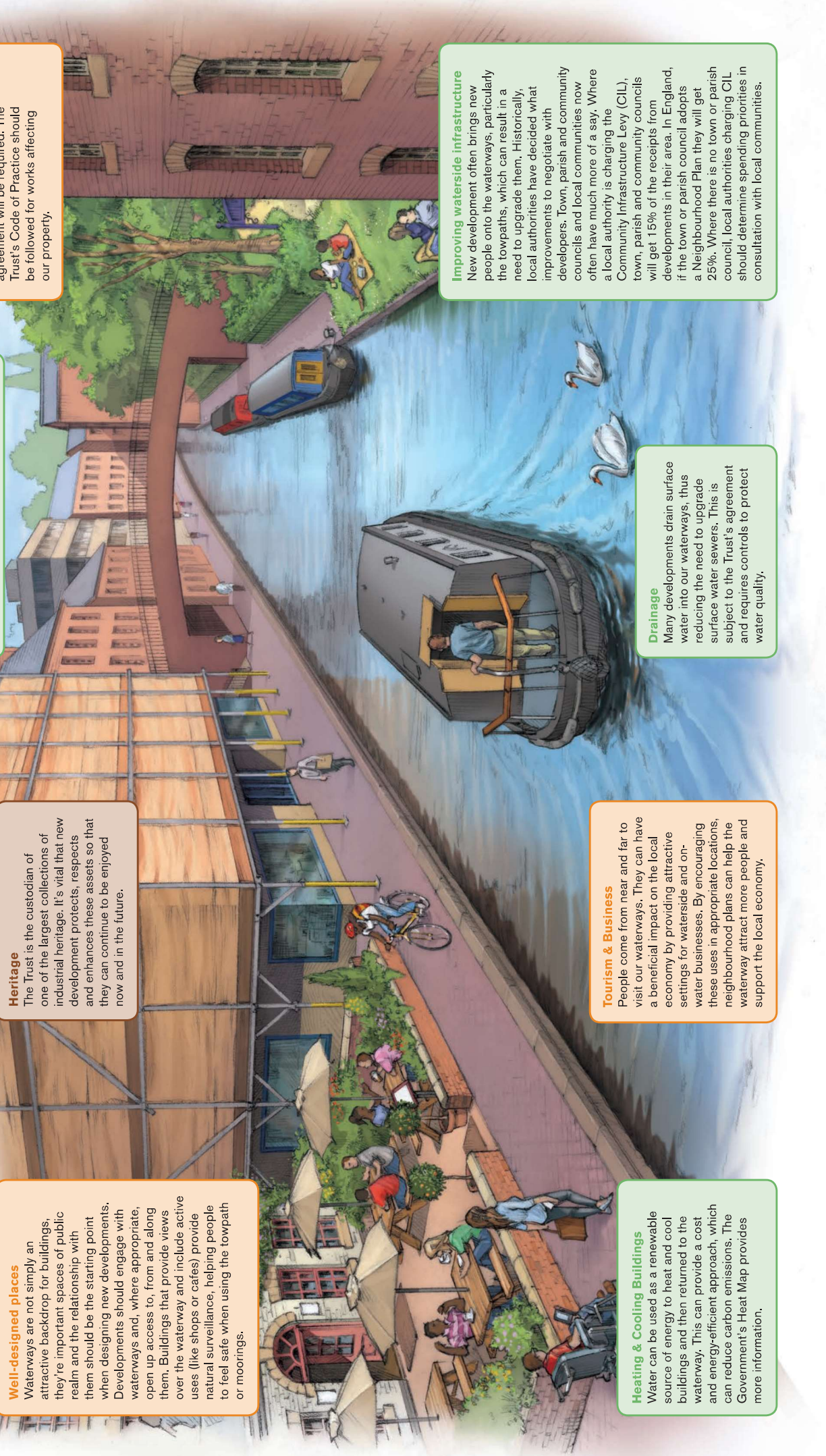
Many developments drain surface water into our waterways, thus reducing the need to upgrade surface water sewers. This is subject to the Trust's agreement and requires controls to protect water quality.

## Tourism & Business

People come from near and far to visit our waterways. They can have a beneficial impact on the local economy by providing attractive settings for waterside and on-water businesses. By encouraging these uses in appropriate locations, neighbourhood plans can help the waterway attract more people and support the local economy.

## Heating & Cooling Buildings

Water can be used as a renewable source of energy to heat and cool buildings and then returned to the waterway. This can provide a cost and energy-efficient approach, which can reduce carbon emissions. The Government's Heat Map provides more information.





# Enriching Lives:

**Waterways make people's lives better by providing a place for people to visit and escape to – for hobbies, relaxing and spending time with family and friends.**

## Recreation

In an increasingly fast-paced and crowded world, our canals, rivers, docks and reservoirs provide much-needed spaces where we can slow down, enjoy the environment and relax. On both land and water, waterways support various activities, including walking, cycling, boating, canoeing and fishing. Some of these may require plans for specific facilities, whilst people's enjoyment of others may be enhanced by investment in infrastructure.

## Arts & Culture

In many parts of the country, waterways provide great focal points for a wide range of different arts and culture projects, broadening participation and improving wellbeing. New projects may be suitable uses of Community Infrastructure Levy funding.

## Physical Health

Waterways provide an ideal environment for people to get outside and get active. They support many forms of physical activity, both on the water and alongside it. By improving the quality and safety of towpaths and their environs or by supporting facilities necessary for on-water uses, planning can support the role that waterways play in encouraging people to take up physical activities.

## Mental Health

Waterways provide an ideal environment in which people can relax and spend time enjoying nature and tranquility, hopefully reducing stress in the process. In addition, by volunteering to work with us on the waterways, people have new opportunities for social interaction and to build their self-esteem.

## Adoption

Local community groups have the opportunity to work in partnership with us to care for specific sections of their local waterways by adopting them. There are various tasks that you could get involved in, from maintenance to promoting the waterway. Why not think about adopting the stretch of waterway through your neighbourhood area to take the community's care for it a stage further?

## Volunteering

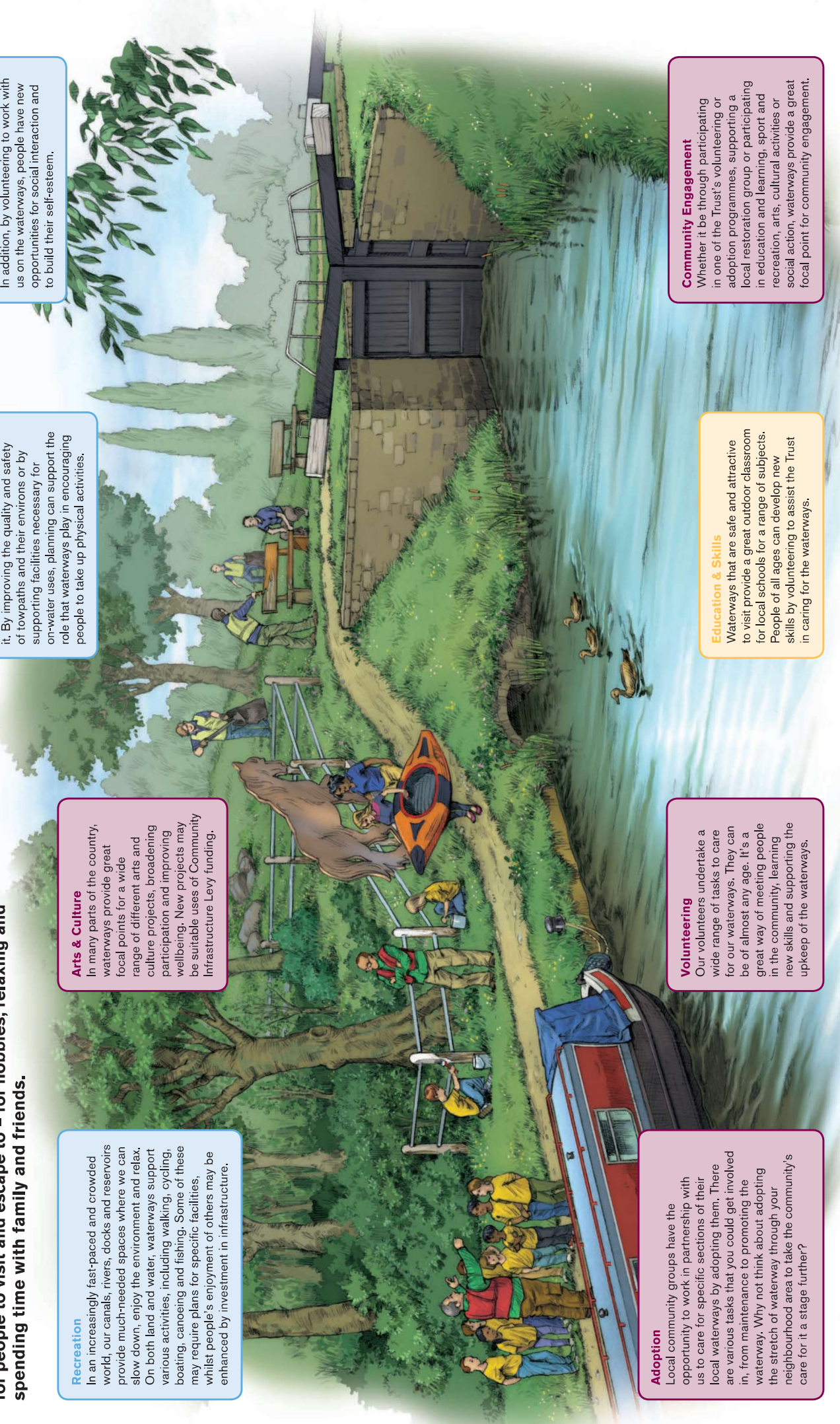
Our volunteers undertake a wide range of tasks to care for our waterways. They can be of almost any age. It's a great way of meeting people in the community, learning new skills and supporting the upkeep of the waterways.

## Education & Skills

Waterways that are safe and attractive to visit provide a great outdoor classroom for local schools for a range of subjects. People of all ages can develop new skills by volunteering to assist the Trust in caring for the waterways.

## Community Engagement

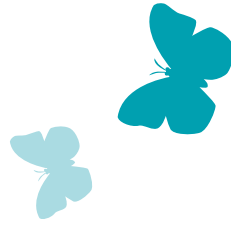
Whether it be through participating in one of the Trust's volunteering or adoption programmes, supporting a local restoration group or participating in education and learning, sport and recreation, arts, cultural activities or social action, waterways provide a great focal point for community engagement.



# The Canal & River Trust's Guiding Principles for Planning and Design

- Individual waterways and water spaces need to be viewed as an integral part of a wider network, and not in isolation.
- 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 the development and use of the water and waterside land – look from the water outwards, as well as from the land to the water.
- 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.
- Improve the appearance of the site from the towing path and from the water
- It should be recognised that appropriate boundary treatment and access issues are often different for the towing path side and the offside.

**For further information when preparing planning policy documents and responding to planning applications related to waterways please see our website.**



# Producing a Neighbourhood Plan

Town and parish councils and/or local communities can produce planning documents, which set out policies against which applications are judged. They can also produce Development Orders granting planning permission for certain types of development. National Planning Practice Guidance provides more information on the process of preparing these documents, including basic conditions that need to be met. We're keen for communities and/or town and parish councils to engage with us early in the process and throughout.

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