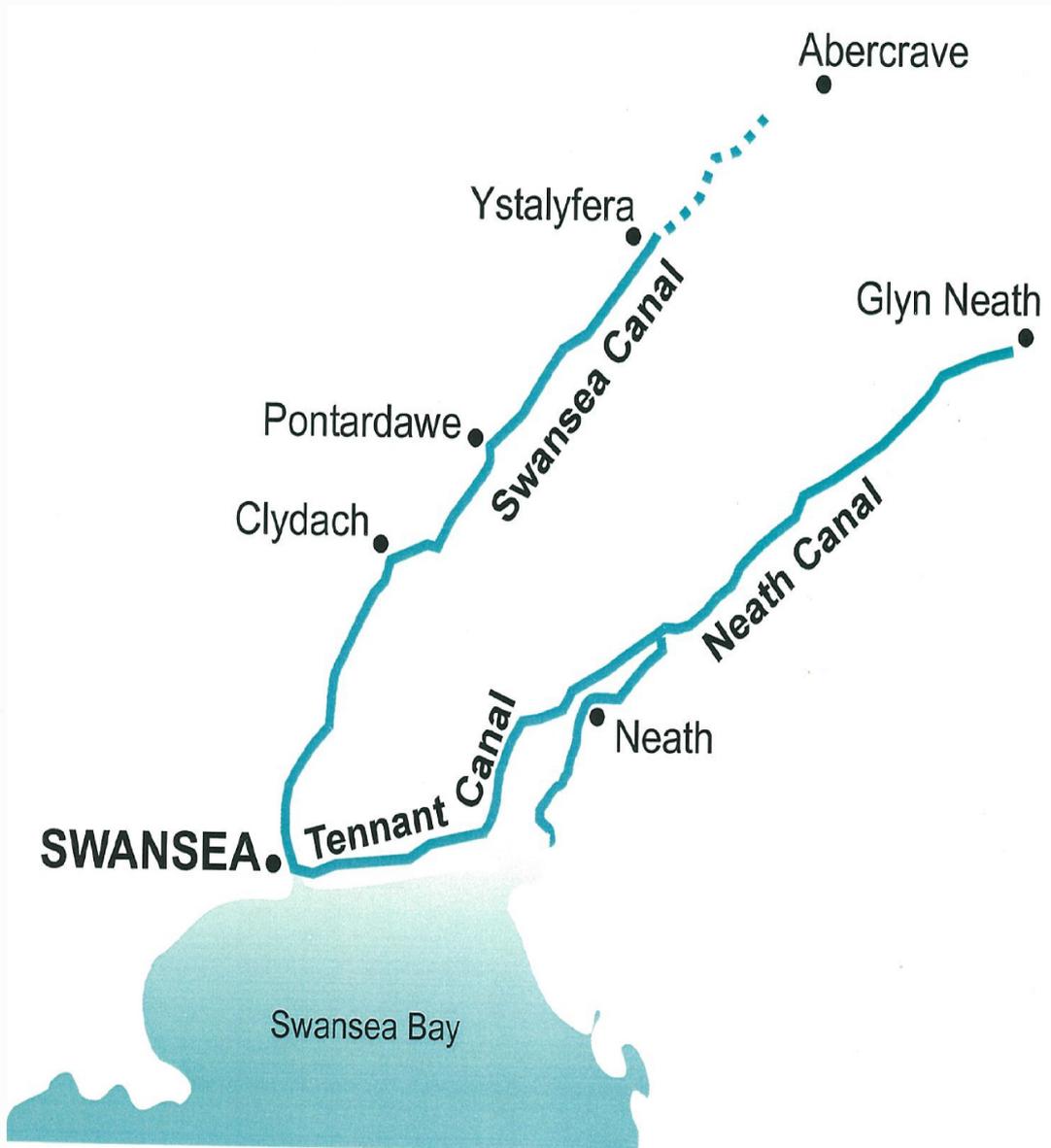


**Statement on behalf of
Inland Waterways Association
re Neath Port Talbot Local Development Plan**

Representor No 0019

Session 16

Matter 10



The Swansea Bay Inland Waterway

STATEMENT ON BEHALF OF IWA re N P T LDP.

This statement is in elaboration of the objection lodged to the wording of policy BE 3 of the deposit version of the Neath Port Talbot Council Local Development Plan. While this plan seeks to protect the lines of the Swansea, Neath & Tennant Canals it only does so in a partial manner.

The Local Planning Authority have wisely, in our view, sought to protect the lines of the canals for a number of years and policy RO6 of the NPT UDP most creditably did this. This approach is entirely consistent with the protection afforded by almost every other Planning Authority in Wales & England who have active or derelict canals passing through their areas. Examples of such policies are contained in Appendix 1. Swansea County Council include in their UDP an indication that a criterion for monitoring their success is the length of canals restored.

It is abundantly clear that, unlike the situation the 1950s and 1960s, canals are now recognised as assets to an area and are not liabilities. They are seen, not as hindrances to urban and rural renewal regeneration, but as catalysts for economic and tourism development.

The deposit plan policy shows that the NPT does understand this potential but regrettably fails to recognise that a canal is a linear feature which can only achieve its full potential if it is continuous from end to end. Continuity is vital because otherwise it can become a series of disconnected “duck ponds” which substantially reduce the value. The UDP included a commendably concise and thoughtful approach to the matter, including as it does the unequivocal requirement to protect the whole canals including the missing links. For some, as yet unexplained reason, the LDP takes a markedly different approach only protecting the sections in water and only giving a guarded protection to the vital missing links. No one would ever seek to protect the line of a railway or a road in this way.

Whilst the canal was built for boating, it now fulfils a much wider range of transport and recreational functions. However whilst a canal without boats can still be used for many of the other functions, its quality is greatly diminished because its attractiveness depends to a large degree upon the interest and excitement of brightly coloured boats moving up and down and working the locks. In addition boats provide an income to keep the canal in good repair, keep invasive plant life in check and provide a degree of security.

The absence of boats in its self does not mean that the isolated section is unused but clearly a significant *raison d'être* has gone. For canoeists, the lack of powered boats endangers the navigation because weed growth is unchecked and it is far less attractive to have to lift the canoe out and physically carry it over the blockage. For walkers, the break appears as an active discouragement to further exploration and the absence of boats and life reduces the attractiveness.

For cyclists once again the interest is diminished and the break creates a measure of insecurity about the route to be followed and reduces the confidence that the path can be followed further up the valley.

The canal is a haven for wildlife but as ecologists have increasingly realised, isolated nature reserves are of much less value than an interconnected green network. This provides an opportunity where species can move from area to area and interact with other creatures. A break of 100 yards is sufficient enough to discourage/prevent that with a reduction in the richness of life either side of the blockage.

Exclusion of section(s) suggests to the land owners and funders for any restoration that the Council is not seriously committed to restoration. It suggests that the completion of restoration is not essential or that it cannot reasonably be expected in the foreseeable future. The severe danger is that it will be a self-fulfilling prophecy. If NPT is really believing that, then it will be the only Council in Wales or England which has a restorable canals with active Groups working towards that aim, not giving the project its 100% support.

The proposed Swansea Bay Inland Waterway will create a 35 mile waterway linking the Neath and Tennant Canals with the Swansea Canal via Swansea docks, the River Tawe and a new stretch of canal through Swansea Vale. This project has the support of the national canal authority (CRT) and the national volunteer organisation (IWA). The completed project will elevate these canals from a series of short waterways of purely local interest to a network of some 35 miles which is sufficient to attract visitors from further afield and the provision of a marina and a boat hire base creating jobs and associated spin-offs to the local communities.

It is not clear what lies behind the meticulous exclusion of the unnavigable/infilled sections from the protection policy. The maps show the canal line as continuous which is how it should be. The Plan repeatedly refers to the canal "network" which the dictionary describes as an system of "interconnecting" lines. You cannot have a successful network which is not connected.

If, as we hope, the probable intention of the Local Planning Authority is to defend the entire lines of the canal then the policy BE3 (2) is misleading and gratuitously unhelpful to the landowners/developers affected. It makes no attempt to define what "... the possibility of future reinstatement..." means nor what "avoid(ing) where possible..." implies.

PPW 7 says

"LDPs should give developers and the public certainty about the type of development that will be permitted at a given location."

"The possibility of restoration": the Canal groups and the CRT are in no doubt at restoration of the entire lines of the three canals is 'possible'. The Huddersfield Narrow Canal passed through the town centre of Stalybridge and following the canal's abandonment in 1944, about one mile of canal was filled in, built over with a sports centre, factories and access roads and car parks. The Council accepted that the best route for a restored canal was along the original line and that happened in 1999 -2001. The canal was completed and has won awards and plaudits from the local business community who now reap the benefits. The Rochdale Canal was closed and a large supermarket built over part, along with several miles of canal filled with concrete as an urban park (which was universally decried as a disaster) The supermarket has gone and the canal is now open again throughout. There is no reason whatsoever why the sections of the Neath Canal and the Swansea Canal cannot be subject to similarly imaginative restoration schemes. The 2002 study

undertaken by Atkins to which NPT was a partner is clear that restoration is perfectly feasible.

“Avoiding where possible”: We can foresee no reason why any development adjacent to the canal line could not be designed leaving the line of the canal (some 6 metres wide plus a 2 metre footpath) unobstructed. Indeed if residential properties are being considered, the developers will without doubt find their scheme enhanced by the presence of a restored canal alongside. Clause 2 leaves landowners with the message that the Council is ambivalent about the restoration of the canal. They could assume, as we fear, that the Council is not necessarily prepared to defend the canal line and thus that they should try projects which fail to protect the line of the canal. Certainly, any attempt to build over the line would be resisted by the canal bodies and who would no doubt put forward a robust case in its defence. They could be put to considerable design expense and delay only to find that the canal is to be protected after all.

The question is whether there is a possibility of something so crucial to the future of the area that building over a filled in section of canal would run the risk that the canal restoration project would have to be compromised. Given the long term commitment made by the previous UDP and the general perceived lack of developable land, it seems highly plausible that this could be the case.

In the Environment Topic paper the matter is discussed:

6.1.7 The LDP will need to include a policy which seeks to protect the canals where appropriate and in particular, in areas where development could compromise their use and future restoration.

No explanation or evidence is provided as to explain or justify why the full protection policy excludes all the lengths which are currently un-watered.

We believe it would be much more helpful to delete clause two and to extend protection to the entire lines of both canals.

Inspector's Questions

- **Is the approach to the protection and restoration of the canal network contained in Policy BE3 consistent with national guidance?**

We say emphatically “no”.

Specifically we refer to PPW7 paragraph 11.1.13.

Local authorities should seek to protect and enhance the rights of way network as a recreational and environmental resource. They are also encouraged to promote the national cycle network, long distance footpaths, bridleways, canals, and the use of inland waters and disused railways as greenways for sustainable recreation.

In TAN18 local authorities are urged to “..identify and protect .proposed routes suitable for use by cyclists and walkers. These may include recreational ...routes along.. canal towpaths...”

The policy which fails to give full and unequivocal protection to the canal as a linear feature throughout its length does not provide for a greenway for recreation. It creates a series of fragmented sections of isolated waters.

- **What would be the benefits of restoring the full length of the Swansea Canal? Should that section between Trebanos and Pontardawe be safeguarded under Policy BE 3? Is it likely that its restoration could be delivered within the Plan period?**

British Waterways, the predecessors of the Canal and River Trust produced a document in 2003 setting out the benefits which can be achieved through canal restoration. The specific details for the Swansea and Neath & Tennant canals are appended to this document. At that time, the projected outputs from the total restoration were given as

- 30 -50% of the construction costs being spent in the local communities
- £4-5M per year of increased tourism spend
- 10-20% uplift in land values in the canal corridor
- Community and training benefits

The section between Trebanos and Pontardawe is easily restored within the Plan period and should most definitely be safeguarded.

In 2014 Moss Naylor Young (Town Planning – Transport Planning- Waterway Regeneration Consultants) were commissioned to produce a further study of this section. Their conclusions include:

The restoration is straight forward from an engineering perspective with no obstacles that are different in character to any already implemented in restoration elsewhere.

and

It is also critical that the canal is not blighted further by development, thus retention of protection within the emerging local plan is essential if the overall benefits are to be achieved.

- **What would be the benefits of safeguarding the Neath Canal between Ysgwrfa Bridge and Glynneath under Policy BE 3? Is it likely that its restoration between Ysgwrfa Bridge and Manor Drive could be delivered within the Plan period?**

As regards the Neath Canal between Ysgwrfa bridge and Glynneath the same considerations apply as are considered above for the Swansea Canal.

- **Considerations appropriate to the entire waterway network.**

In summary, the truncation of the canal at artificially inappropriate points isolates the communities beyond the obstructions from the full benefits. It reduces the lengths available and thus will reduce the attractiveness to boat operators and owners. Depending upon the number of locks, a boater might be expected to cruise between 10 to 30 miles a day. A canal of 35 miles (ie 70 miles return) with 30 locks will provide an excellent leisurely week's holiday cruise.

Since 2002, as proposed in Appendix 2, nearly £5 million has been spent on the Neath Canal, improving water quality, building a new aqueduct across the River Neath, restoring four locks among other things, all with the support of NPT. Work is ongoing in the restoration of Trebanos Locks. In Swansea, Glandwr Cymru, the Canal and River Trust in Wales is in negotiation with the Council over the restoration of the canal through the old Clydach Council Yard and plans are being prepared for the creation of a stretch of canal reconnecting the Tennant Canal with Swansea docks.

- **We are asked whether the restoration could be delivered within the plan period i.e. by 2026.**

The answer must be that it depends upon the funding becoming available. Canal restoration schemes across Wales and England have been completed after many years campaigning and after funding packages from a variety of sources were put together. Restoration of the Kennet & Avon Canal linking Bristol to the River Thames was started in the 1960s and finally completed in 1990 when the Queen formally reopened the canal. The Huddersfield Narrow canal took from 1972 to 2001, the Rochdale Canal took from 1974 to 2002. All these were only made possible because the Local Authorities concerned protected the entire lines of the canal from very early on in the projects. At that time the funding packages were not in place and no one could accurately predict when the project might be completed. The adoption of protection policies provided a crucial foundation for the projects.

With a 100 % protection of the entire lines of all the canal, the campaigners can go to the variety of funding bodies and confidently say that the finance needed will be safe. Without it, such bodies are likely to reflect that the absence of full commitment renders their investment in the project at risk of not achieving the full potential.

- **Test of Soundness:**

We are asked to comment on whether we consider the plan to be sound.

We do not, for the reasons set out above.

If the inspector wishes add flexibility into the plan it could be replaced by:

“Where the former canal line or an agreed line of the Swansea, Neath and Tennant Canals has been obstructed, the Council will protect that line from anything which will prevent the restoration of the canal. In an exceptional case an obstruction maybe permitted if a line for a diversion has been fully designed and granted planning permission.”

Conclusion:

It is our view that the environment, the economic health of NPT, the health and well-being of its residents would be best served by simply protecting the lines of the three canals in their entirety. For NPT this means from Glyn Neath to Briton Ferry and from Aberdulais Junction to the boundary with Swansea. and from Ystalyfera to Trebanos.

We ask that policy BE 3 paragraph 2 be deleted and the protection accorded by paragraph1 extended to cover the full length of the canals mentioned.

Robert A Dewey BA (hons) MBA, Dip TP. Dip Est Mgmt, Dip Transport MRTPI
Hon Planning Advisor
Inland Waterways Association

Margaret Gwalter
South Wales Branch Inland Waterways Association

Appendix 1 – Examples of Local Plans

Appendix 2 – Waterways for Wales:
Section 3.4.3.Swansea, Neath and Tennant Canals

Appendix 1.

2 examples of canal lines protected in Welsh Local Development plans.

Oswestry Borough Local Plan

POLICY TM 6 - Montgomery Canal Restoration

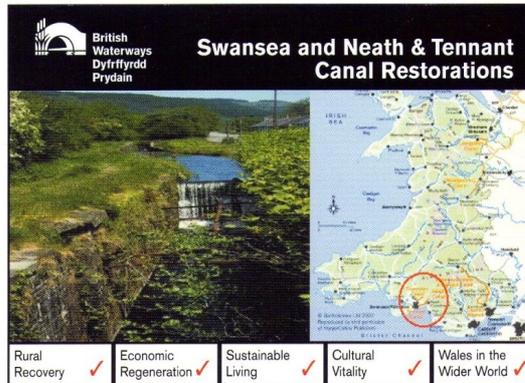
The restoration of the Montgomery Canal is supported by the Borough Council. The Council will actively participate in the proposed restoration scheme. The line of the Montgomery Canal and its immediate environment will be protected against other forms of development which might compromise the restoration of the canal and the provision of canal-side facilities.

Monmouthshire LDP adopted 27th February 2014

Policy MV6 – Canals and Redundant Rail Routes

Canals, redundant rail routes and associated facilities will be protected from development that would prejudice future sustainable transport use.

3.4.3 Swansea, Neath & Tennant Canal



Project description

This project will restore the canals to navigation between Briton Ferry, Neath, Glynneath, Swansea and Ystalyfera creating a waterway of some 35 miles length. The length will allow a leisurely week or energetic short break holiday to be taken.

WS Atkins have finalised a feasibility study. They have recommended that a combined flood alleviation and restoration project be developed at the ten arch Aberdulais Aqueduct, where increased flood capacity and defence works could go hand in hand with stabilising and restoring the structure and the adjacent lock. This is the only significant structural obstacle to reopening about ten miles of canal in the Vale of Neath.

The indicative costs are of the order of £55 million for this scheme. These costs are at this stage uncertain and a number of assumptions and contingencies are built in. If ongoing adjacent developments embraced the waterways, costs could be reduced significantly and funding found as part of these developments.

Project outputs

- 30-50% of construction costs could be spent in local economy
- £4-5 million each year projected increased tourism spend
- 10-20% increased land development value in canal corridor
- Community and training benefits in using trainee and volunteer workers
- Reopening of an important part of the industrial evolution of Wales

Potential project partners

- British Waterways
- Swansea City Council
- Neath and Port Talbot Borough Council
- Welsh Development Agency
- Local canal societies
- Neath, Tennant Canal Navigation Companies

Funding required

Funding for feasibility study raised. Portfolio of funding for restoration to be developed.