



South Staffordshire District Council
Council Offices
Wolverhampton Road
Codsall
South Staffordshire
WV8 1PX

Your Ref Publication Plan

Our Ref CRTR-POL-2022-37575

Friday 23 December 2022

Dear Strategic Planning Team,

Proposal: South Staffordshire Local Plan Review - Publication Plan (Reg 19)

Thank you for your consultation.

We are the charity who look after and bring to life 2000 miles of canals & 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 Trust is a statutory consultee in the Development Management process.

As outlined in our previous response to the Local Plan Preferred Options (November 2021) consultation¹, the district's canal network, including several canal feeder reservoirs, is extensive and important for various reasons. We acknowledge that the Publication Plan incorporates changes made since the previous consultation addressing some of our previous comments, including but not limited to:

- Addressing our comments that the canal towpath would benefit from being upgraded from Pendeford Bridge to Autherley Junction, which forms part of Sustrans National Cycle Network Route 81 (Policy SA1: Land East of Bilbrook requirements);
- Requirements relating to the retention of the rural character of the canal Conservation Area, and providing high quality active travel links through and beyond the site, including the nearby canal towpath network, plus contributions towards highways and active travel mitigation measures, at Strategic development location: Land at Cross Green (Policy SA2);
- Landscaping requirements for Housing allocation: Land at Cherry Brook, Penkridge (Site 005) to protect or enhance the canal Conservation Area;
- Landscaping requirements for Gypsy and Traveller Allocation GT08 - Brinsford Bridge, Stafford Road, Coven Heath to protect or enhance the canal Conservation Area; plus
- Various changes to Policy NB10 - Canal network

We also acknowledge a number of other changes that have addressed potential detrimental impacts on the District's canal network, including:

¹ Our ref. CRTR-POL-2021-34198

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- Policy HC9: Gypsies Travellers and Travelling Showpeople, which now addresses impacts on adjacent users/residential properties, including residential canal side moorings;
- Housing allocation proforma - Bridge Farm: 54 Long Street (Site 426a), which identifies that development will need to be sensitively designed in line with the HESA² – stage 2 (2022) recommendations reflecting its proximity to the Canal Conservation Area; and
- various Gypsies Travellers and Travelling Showpeople allocation requirements addressing the need for mitigation addressing canal corridor setting.

The Trust provide the following comments addressing allocation changes that would affect the canal network and land adjacent to it, and how these allocations could be improved to impact positively on the canal network. Comments are provided to assist the Council in their consideration as to whether further changes to the Plan should be made, for example through proposed modifications, and assist the Inspector in his examination of the Plan.

These comments deal with promoting sustainable transport, noting that:

- Para 34 of the NPPF states that Plans should set out the contributions expected from development, including those associated with transport and green infrastructure;
- Para 104 of the NPPF states that opportunities to promote walking, cycling and public transport use should be identified and pursued through the plan-making process; and
- Para 106 states that planning policies should provide for attractive and well-designed walking and cycling networks.

Policy SA3 – Strategic development location: Land North of Linthouse Lane

Although no comments were made on this allocation in our previous response, changes have been made adding objectives for strategic allocations, including, in this case the identification of a potential new canal crossing:

‘Walking and cycling routes and connections into existing neighbourhoods adjacent to the site will be a focus – such as Ashmore Park and Wood Hayes. Greenways will create attractive routes through the new development, focused toward the new community park, aligning green infrastructure with active travel corridors to encourage sustainable access and a potential crossing over the canal will further enhance opportunities for linking up travel to the wider vicinity.’

A location for a potential crossing over the Wyrley & Essington Canal has not been shown on the Concept Plan. Any canal crossing will need to be discussed further with the Trust, the relevant local authority, and other affected landowners to establish its appropriateness and deliverability. We appreciate that the proposed allocation is located close to the district’s boundary whilst the canal and towpath are located within the City of Wolverhampton.

The canal dates from the late 1700s and there are historic (unlisted) accommodation bridges along this stretch. Depending on the location of a future crossing, it may have some effect on residual historic evidence of previous wharfs, culverts and weirs that historically followed the canal, some of which are still present. Spacing, in relation to existing historic crossings will also be an important consideration.

Although the site is not adjacent to the canal, future development has the potential to increase use of the towpath. The existing towpath in the Linthouse Lane area is part of Transport for West Midlands Starley Network³. However, it is not in good condition and should be improved.

² Historic Environment Site Assessment

³ <https://www.tfwm.org.uk/plan-your-journey/ways-to-travel/cycling-in-the-west-midlands/starley-network/>

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Requirement e) of the policy includes high quality active travel links through and beyond the site integrating the existing public rights of way running through the site and providing links to Ashmore Park and facilities to the west of the site. The policy vision recognises the site's strong link with Wolverhampton.

The canal towpath offers off-road cycling and walking links south to Wednesfield High Street, Wolverhampton City Centre, the nearest railway station, and other facilities, such as Bentley Bridge Leisure Park and New Cross Hospital.

Below we have provided amended text below for consideration, with changes in bold, underline text:

'Policy SA3 – Strategic development location: Land North of Linthouse Lane

.....

The site-specific requirements should include:

.....

*e) A transport/movement strategy which includes consideration of access onto Linthouse Lane, Blackhalve Lane and Kitchen Lane and appropriate public transport provision to support sustainable travel from the scheme; and high quality active travel links through and beyond the site, integrating the existing public rights of way running through the site and providing links to Ashmore Park and facilities to the west of the site, **as well as improving the Wyrley & Essington Canal towpath to the south, which provides links to Wednesfield Town Centre, Wolverhampton City Centre, its railway station and other facilities, such as Bentley Bridge Leisure Park and New Cross Hospital;***

.....

6.25 Environmental

Transport & Movement

.....

*Walking and cycling routes and connections into existing neighbourhoods adjacent to the site will be a focus – such as Ashmore Park and Wood Hayes, **as well as links towards Wednesfield Town Centre, Wolverhampton City Centre, its railway station and other facilities, such as Bentley Bridge Leisure Park and New Cross Hospital.** Greenways will create attractive routes through the new development, focused toward the new community park, aligning green infrastructure with active travel corridors to encourage sustainable access and a potential crossing over the canal will further enhance opportunities for linking up travel to the wider vicinity. **Developers will be expected to engage with the relevant Local Authority and the Canal and River Trust on any potential canal crossing to ensure it is appropriate and its design and location are acceptable.***

Housing allocation - 006 Penkrige - Land at Boscomoor Lane

This allocation was not included in the previous version of the Plan.

Although the site is surrounded by residential development when viewed from the canal towpath or from the Wolgarston Way road bridge⁴ it has a green and much more rural character. We support the key requirement to retain and reinforce existing tree and hedgerow to protect the Canal Conservation Area and the setting of the locally listed Lyne Hill Bridge, as well as access requirement for connection to the canal towpath.

⁴ Cross Keys Bridge 83a

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In terms of reinforcing existing planting, we would encourage a meaningful buffer between the towpath and future development be provided to retain the semi-rural character of the canal corridor. This buffer area should be appropriately landscaped with native species that would provide for biodiversity net gains in the area.

The towpath alongside the site provides links to the north to other parts of the village as well as out towards open countryside to the south for recreation. Improvements to this section of the canal towpath⁵ have been identified in the Councils' Infrastructure Delivery Plan 2022⁶.

A requirement to make some contribution towards improvements should be included in the Plan. We note that it may be easier for a future developer to carry out a local upgrade when the towpath connection is provided, subject to Trust Approval, rather than through financial contributions. Appropriate surface treatment will need to be considered at that stage.

Below we have provided amended text below for consideration with changes in bold, underline text:

*Provide vehicular and pedestrian access via Boscomoor Lane ensuring continuous pedestrian links between the site and Wolgarston Way and connection to the canal towpath, **as well as improvements to the canal towpath surface**.*

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

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Area Planner

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<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

⁵ Between bridge 82 Otherton Lock and 83a Cross Key bridge

⁶ <https://www.sstaffs.gov.uk/doc/183729/name/04%20IDP%20November%202022.pdf>

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