

## Wilts & Berks Canal Trust

## Patron: The Former Duchess of Cornwall

Restoring all 70 miles of the Wilts & Berks Canal to create a tranquil public waterside park for walking, cycling, fishing and boating

By Email

Planning Services Swindon Borough Council Wat Tyler House Beckhampton Street Swindon SN1 2JH

12<sup>th</sup> June 2023

Dear Sir / Madam,

Consultation Response on S/COND/22/0411 - Variation of conditions 9, 10, 41, 42, 43, 46 and 47 from previous permission S/OUT/19/0582 - Lotmead Site Eastern Villages Swindon

The Wilts & Berks Canal Trust **Objects** to the proposal for the reason given below.

The drainage and flood protection proposals present an obstruction to the canal corridorand are therefore not compliant with the Local Policy EN11: Heritage Transport.

The Revised Flood Risk Assessment Addendum in Section 4 refers to the canal corridor and states that "The proposals will not prejudice the future alignment of the Canal and, indeed, the proposed floodplain reinstatement within the eastern part of the site will help support its delivery, as described in the Design and Access Statement. The proposed line of the canal is shown in Appendix C on the updated Illustrative Masterplan, Drawing No. PL1461.1-PLA-00-XX-DR-U-0002-S4." While the referenced drawing is not included in the submitted documents other drawings are including "Strategic Site Wide Water Drainage Strategy 22006-HYD-PO-XX-DR-C-222 Rev 6 "and variants which show flood alleviation works, ditches and bunds which conflict with the canal corridor. The works are not dimensioned here but conflict with the level of the canal water channel. How the proposals "will help support" delivery of the canal is not evident.

In responding to an earlier application in April 2022 the Trust raised several issues which have still to be resolved or responded to by the applicant.

1) The phasing of the plots adjacent to the canal corridor are scheduled for development from 2030 onwards. However, there will be preparatory works in phase 2 including planting of the woodland area and the excavation of additional flood storage capacity as objected to above. These works will impact on the canal development by restricting access and limiting environmental mitigation opportunities for both projects. The Trust has offered to work with the applicant to co-ordinate the design of all the works within the green boundary zone.

- 2) Given the nature of the flood alleviation measures within and adjacent to the canal corridor there is a considerable logic to carrying out the bulk of the earthworks operations for the canal at the same time. The canal construction through that section will require fill material and will act as the flood bund. A combined operation would potentially reduce heavy traffic in the locality, reduce noise and dust, and reduce disturbance to wildlife and the margins of the watercourse and ensure that such disturbance would be completed before the nearby housing is occupied.
- 3) The Trust has offered to work with the applicant to minimise the environmental impact and assist the adjacent developer by a minor revision to the canal corridor in the southwest corner, without a response.
- 4) The Plans for Phasing of Works show "Proposed canal towpath to be delivered by third parties" on both sides of the canal. The Trust's policy is to provide a towpath on one side only. Usually, the other side is then protected as a wildlife zone. This would be consistent with the description of the area on the consented parameter plan for green infrastructure which shows the woodland as "Woodland with managed access" with the towpath on the northwest side.

Yours Faithfully

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Head of Planning, WBCT Executive Board

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