

Lotmead Site, Eastern Villages, Swindon

Section 73 Application: Project Team Response to Canal Trust Comments

Application Ref. S/23/0438

Ref.	Canal Trust Comments (12/06/23)	Project Team Response
1	The Wilts & Berks Canal Trust Objects to the proposal for the reason given below.	-
2	The drainage and flood protection proposals present an obstruction to the canal corridor and are therefore not compliant with the Local Policy EN11: Heritage Transport.	-
3	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.	<p>Section 4 of the Revised FRA Addendum does not propose any changes in relation to the future alignment of the Canal and is only referenced in the Revised FRA Addendum for the purposes of completeness.</p> <p>As referenced in the Canal Trust comments, the Revised FRA Addendum references Illustrative Masterplan, Drawing No. PL1461.1-PLA-00-XX-DR-U-0002-S4 under Appendix C. This is the masterplan approved at Outline with the canal route identified. Further, the canal route is secured under Condition 60 of the Outline approval.</p> <p>The proposed flood restoration works are required under Condition 40 and 42 of the Outline permission (to enable to the development to be outside of the Flood Zone) which this Section 73 does not seek to amend. Details have been submitted under a separate Discharge of Condition application to secure these works. Detailed comments from the Canal Trust are welcomed on this application to ensure the Canal Route can be appropriately safeguarded whilst ensuring the mitigation works are complete in accordance with Environment Agency’s standards to enable development on Lotmead Farm.</p>
4	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	With regards to the comments previously raised in April 2022, these are in relation to condition 9 (Phasing), which is not proposed to be amended via this Section 73 application.

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	<p>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.</p>	<p>Regarding the start on site date for the flood restoration works, this is subject to pre-commencement conditions (40 and 42) which are yet to be discharged. Once agreed, CSS are happy to share a programme of works with Canal Trust to ensure works can be co-ordinated if necessary.</p>
5	<p>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.</p>	<p>These mitigation works are required to enable development on Lotmead Farm therefore commence cannot be delay once consent for the works is granted.</p> <p>We are unaware of any development consents the Canal Trust currently have in place for this part of the proposed canal route. We would be grateful if the Canal Trust could share their delivery programme for CSS's information.</p>
6	<p>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.</p>	<p>Noted. CSS are happy to co-ordinate with the Canal Trust if programmes align.</p>
7	<p>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.</p>	<p>Noted. CSS are happy to discuss the potential to amend these arrangements via a separate application.</p>
		<p>In conclusion, on the basis that the current Section 73 application does not propose any changes or amendments to the safeguarded canal route, we trust that this resolves this objection.</p>