



RTPI

mediation of space · making of place

Royal Town Planning Institute
41 Botolph Lane
London EC3R 8DL
Tel +44(0)20 7929 9494
Fax +44(0)20 7929 9490

Email online@rtpi.org.uk
Website: www.rtpi.org.uk

Registered Charity Numbers
England 262865
Scotland SC 037841

Patron HRH The Prince of Wales KG KT PC GCB

23rd March 2010

Inland Waterways Consultation
Inland Waterways Team
Department for Environment, Food and Rural Affairs
Area 2D Ergon House
17 Smith Square
London SW1P 3JR

Email response sent to: wferesponses@defra.gsi.gov.uk

Dear Sir/Madam,

RESPONSE TO CONSULTATION PAPER: Waterways for Everyone: The Government's strategy for the inland waterways of England and Wales

Thank you for the opportunity to respond to the above. The Royal Town Planning Institute (RTPI) is a membership organisation representing over 22,000 spatial planners. It exists to advance the science and art of town planning for the benefit of the public.

This document responds to the consultation *Waterways for Everyone: The Government's strategy for the inland waterways of England and Wales*.

The response has been formed drawing on the expertise of members including the Water and Marine Spatial Planning and Biodiversity Interest Groups of the RTPI Environmental Planning and Protection Network, and RTPI Cymru.

On the whole, we support the document and the increased emphasis that it places on specific policy areas which impact on inland waterways, including climate change mitigation and adaptation, environmental improvement, healthy lifestyles and improved well-being and neighbourhood renewal.

Application in Scotland and Wales: As a final point, we would suggest that unless this policy is incorporated into Planning Advice Notes/Planning Policy Wales/TANs, as was the case with your previous document *Waterways for Tomorrow*, it will be missed by most planners in Wales. Whilst the Assembly Government is responsible for most things, over, alongside, or under British Waterways Canals in Wales, waterways are not a devolved issue. This is in contrast to Scotland, which is supported by the Scottish Government (arguably to a greater extent than in England and Wales). This relationship has resulted in some superb success stories, and we believe that Wales would similarly benefit from its own policy on Inland Waterways, in order to follow Scotland's lead in generating economic regeneration benefits.

The document also seems to avoid the key issue of funding which, in these difficult economic times, is an increasingly

relevant issue.

Please find responses to the consultation questions set out below.

If you require any further assistance, please contact Rebecca Coates, Planning Policy Officer on 020 7929 9466 or email england.policy@rtpi.org.uk.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'R. Willmott', with a horizontal line above the first few letters.

Roisin Willmott
National Director RTPI Cymru
Enc.

Question 1 (and also paragraphs 3.20 and 9.2)

The RTPI believe that the range of benefits listed could include the potential benefit of residential use of narrowboats/dutch barges etc., in addition to provision of 'bricks and mortar' residential development beside waterways. Living afloat is a household type in its own right and, particularly in expensive urban areas such as London, and can provide an affordable option to renting or buying on dry land. Living afloat can also be attractive to those working on short fixed-term contracts who need an element of flexibility in location of accommodation. In addition, allowing 'live-aboards' can provide a number of community and security enhancements. This potential benefit would be greatly facilitated by more marinas permitting residential use.

Question 2

The RTPI believe that a principal achievement is the increase in usage; waterways are undoubtedly being used more than they were ten years ago, and improvements in water quality. However, attention should continued to be focused on ecology and the spread of invasive species, and the complications that can arise with increased boat traffic and use of tow paths increasing disturbance on habitats and wildlife.

Question 3

The Institute believe that wildlife advisory groups should be involved in this process, to monitor potential conflicts between development and wildlife disturbance.

Paragraph 3.8, which refers to PPG13 and 'restoration projects proceeding in whole or part' – we believe a longer time period is required than the 'development plan period', especially when the potential flexibility of LDF documents is set against the potentially lengthy time in getting restoration projects underway.

Paragraph 5.21 – The RTPI believe that water wastage from leaking/faulty locks should also be considered here. Water usage would also be improved by the restoration of side pounds.

Question 9

Whilst restoration of waterways to attract increased usage can be beneficial in some ways, it is important that this is not to the detriment of diverse wildlife communities that have developed since the cessation of boating. Any restoration schemes should work closely with wildlife groups and advisory bodies such as Natural England and the Countryside Council for Wales, and appropriate ecological surveys should be carried out before work commences.

Question 10 (also paragraph 8.21)

Our members agree that inland waterways, including their paths and surrounding environments provide an important resource for outdoor recreation, sport and improving public well being, and recognise the need to protect and improve these important resources. There is also a need for effective management to ensure that any wildlife present (e.g. otters, voles) is not disturbed.

Paragraph 8.7 states that 'the direct cost of using the inland waterways to transport freight can be more expensive than moving goods by road.' 'Direct cost' depends on what factors are taken into account, especially those not easily quantifiable (such as pollutants, long-term sustainability, ecosystem services). Also the 'pressure on waterfront infrastructure' argument is somewhat circular as if loss is allowed to other uses then it is more difficult to implement freight transport, but without economic use of waterways then the 'desirability' for other uses decreases.

Paragraph 8.15 refers to the Department for Transport's ongoing study into 'current HGV movements and demand to identify the extent to which water freight can become a realistic alternative for existing road traffic'. In this section it may be worth considering rail/waterways interconnections (not just HGV), especially given historic ownership of canals.

Paragraph 8.24: We welcome the promotion of sustainable transport but believe that the need for increased links between waterways and public transport should also be stated here.

Paragraph 10.12: There is a need to define the meaning of 'Compact' in this sentence.