

By email only to: planningpolicy@southkesteven.gov.uk Your Ref Our Ref CRTR-POL-2024-41223 Wednesday 24 April 2024

Dear Sirs,

# Re: South Kesteven Reg 18 Draft Local Plan Consultation

Thank you for your consultation on the above documents.

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 Canal & River Trust (the Trust) is a statutory consultee in the Development Management process, and as such we welcome the opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded, and enhanced within an appropriate policy framework.

Within the district the Trust has responsibility for approximately 9km of the Grantham Canal, the Denton Reservoir and 1.3km of the Knipton Feeder (northwest of Woolsthorpe by Belvoir). The canal and the reservoir provide publicly accessible green blue infrastructure that is of both heritage and ecological value to the district.

The waterways are acknowledged as significant green blue infrastructure, but they also function as blue infrastructure, serving as a catalyst for regeneration; a sustainable travel resource for commuting and leisure; a natural health service acting as blue gyms and supporting physical and healthy outdoor activity; an ecological and biodiversity resource; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape; a contributor to water supply and transfer, drainage and flood management. The waterway network forms part of the historic environment, the character, cultural and social focus of the district.

Please find below the Trust's response to your draft Local Plan documents. We hope that the comments provided are clear and helpful and that your next revision will address these points. We are willing to continue to work with you, to meet and discuss these points for clarity and to seek to work together towards a high-quality district that relates positively with the waterway network.

# Draft Local Plan to 2041

New Policy 4: Biodiversity Opportunity and Delivering Measurable Net Gains

This policy is based on the emerging evidence of the Biodiversity Net Gain in Greater Lincolnshire – A Framework Approach Supplementary Planning Guidance which is a joint study led by the Greater Lincolnshire Partnership. The

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policy also refers to Biodiversity Opportunity Mapping and Green Infrastructure Mapping, produced for the district by the Greater Lincolnshire Partnership in 2022 that is available at Appendix 1: Principles for Development within Biodiversity Opportunity Areas.

Appendix 1 sets out the hierarchy of sites with the canal and reservoir categorised as - Opportunity for Management - where it states "These areas are not currently Priority habitat but are important for biodiversity and the functionality of the ecological network of which they are part. They provide an opportunity for their quality to be improved through management, with positive results for biodiversity." Whilst we understand that canals and other related infrastructure are not natural resources, they are managed resources, as will many of the other spaces within this category. We therefore suggest that "Opportunity for Enhancement" would be a better reflection of the aims of this part of the plan.

The Trust may be able to assist in meeting Biodiversity Net Gain (BNG) requirements by providing off-site biodiversity units. This would be subject to operational, management and commercial considerations. It would support the Council's aim to provide Development within Green Infrastructure Areas in off-site locations as set out in Appendix 2 and Policy EN3: Green Infrastructure.

### Policy EN5: Water Environment and Flood Risk Management

We understand that the Council is preparing a revised Flood Risk Assessment and Water Cycle study. We would recommend further consultation with the Trust as part of the Water Cycle study to ensure that all evidence is available on our networks contribution to water supply, transfer, drainage and flood management within the district.

### Policy EN7: Protecting and Enhancing Grantham Canal

The retention of Policy EN7 provides protection of the above assets and the opportunity to enhance all of the public benefits presented by our network. We are supportive of the canal restoration initiatives and are aware that the Grantham Canal Society (GCS) is actively working towards securing the restoration of the Grantham Canal to full navigation. We advise that consideration is given to any response from GCS with regards to the impact of the draft local plan on their restoration objectives.

#### Policy OS1: Open Space and Recreation

Appendix 3: Glossary defines the canal as falling within the Open Space category and this policy requires that new housing proposals provide sufficient new (or improved) open space to meet the needs of the development, including off-site improvements which could include to our network. 2ha per 1000 population is required within 720m of the site. This is likely to be relevant at SKPR-74 – The Land West of The Drift, Harlaxton. Here open space is not required on site, so off-site availability of open space will be more important with the canal's proximity able to contribute to this. Access improvements/wayfinding at Harlaxton Bridge may therefore be an appropriate opportunity at this site.

#### Policy ID1: Infrastructure for Growth

This policy requires ALL development to demonstrate sufficient infrastructure capacity (including blue green infrastructure) to support and meet the essential infrastructure requirements. On the western edge of Grantham there are various employment allocations that may need to provide off-site improvements to blue green infrastructure, such improvements could be considered within the canal corridor.

#### Policy ID2: Transport and Strategic Transport Infrastructure

As above developments on the western edge of Grantham may need to provide off-site improvements that could include improvements to the towpath as a sustainable transport route to/from Denton/Harlaxton into Grantham.

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### Local Design Code

We understand that you are working with the Office for Place on a theme-based Design Code for the district. The Trust are also in the process of producing a Design Code for Canals and would recommend you visit our webpage on great waterside places <u>https://canalrivertrust.org.uk/specialist-teams/planning-and-design/creating-successful-waterside-places</u> for updates. Design plays a key role in creating attractive waterside places that will enhance and protect the waterway.

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

Yours sincerely,

Hazel Smith MRTPI Area Planner - Midlands

