

Subject:	Comments by the Manchester Bolton & Bury Canal Society (MBBCS) on the "Applicant Response to Consultee Comments" document from CBRE dated 29/02/2024 Planning reference: 23/82372/FUL
Version	FINAL
Date:	27/03/2024
From:	Manchester Bolton & Bury Canal Society (MBBCS)

1. The heritage bridge parapet retained

MBBCS welcomes the revised plans in respect of the heritage canal bridge parapet on Oldfield Road that are attached to the "Applicant Response to Consultee Comments" document from CBRE dated 29/02/2024. The parapet is now retained.

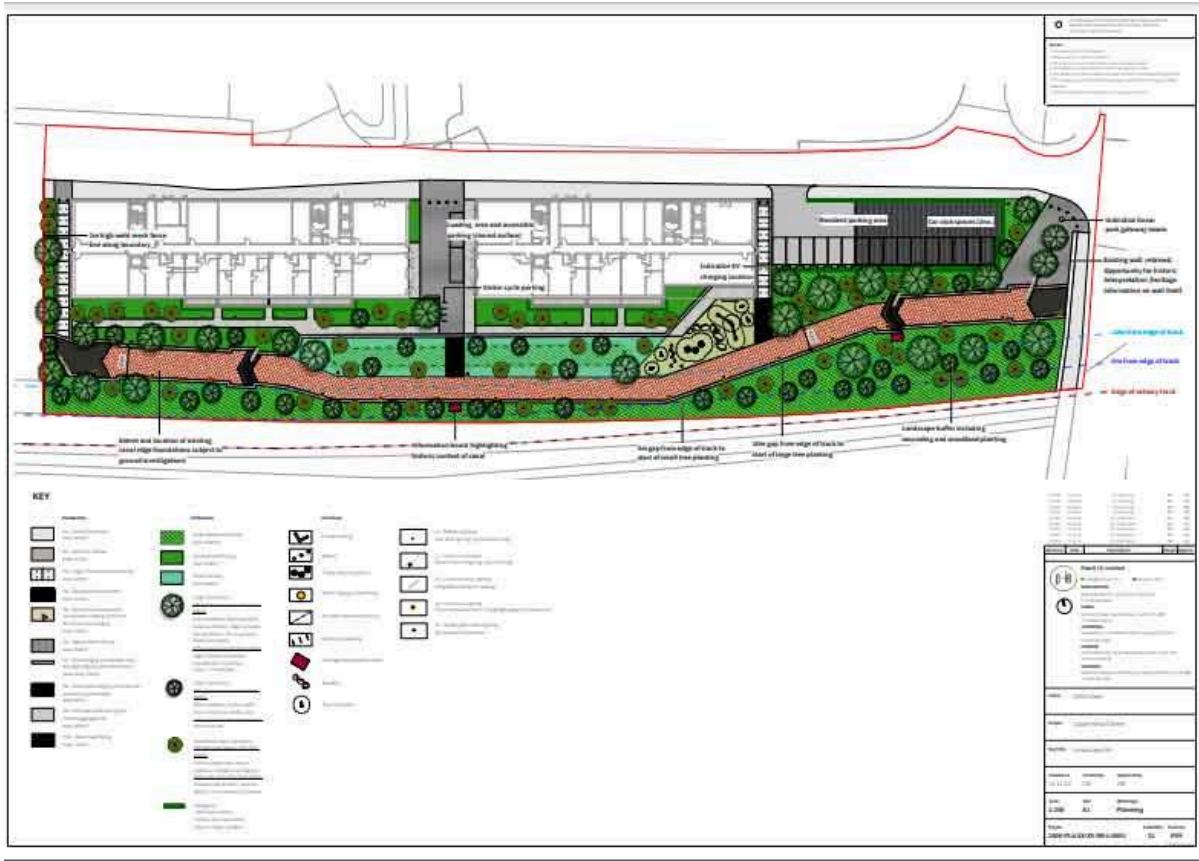


Source: updated Design and Access Statement - Salford Planning Portal 29/02/2024

2. The footpath where water should be

However we remain perplexed by the applicant's desire to lay a footpath along where the water would be in any restored canal. This is not sustainable development. It also contravenes Salford's Local Plan and Policy HE6.

For the canal to be restored, the path shown in the current plans will have to be removed and relocated alongside the canal. We have used current rates obtained from a tier 1 contractor to calculate the burden on restoration. This would be an extra cost in the region of £150-250k at today's rates. In addition, as per the precedent set with the Middlewood locks development, the developer needs to provide full access to the existing lock side together with an appropriate crane loading area for gate lifting in and out. The application should impose no extra significant cost burden which prevent canal restoration (HE6)



Source: Updated Landscape GA - Salford Planning Portal 29/02/2024

3. Destruction of the heritage towpath

Similarly the applicant's plan to unearth and destroy the heritage towpath that runs between the canal and the railway wall is wanton destruction of an historical artifact first laid down in 1797, and revised in 1894.



Photograph of the heritage towpath running parallel to Upper Wharf Street site, looking towards Christ Church, with Oldfield Road behind you. Dated to the 1950s.

4. Restoration of the towpath route

The original entrance to the towpath should be reopened and widened. (see Appendix 1) This would provide an entrance 2.9m wide that could be secured against vehicular access by lockable bollards, removable when needed for service access. Access would be required by CRT to enable maintenance of a restored canal, in particular the lock mechanisms. We propose that the original heritage towpath be exposed and used as a public footpath to commence the realisation of the ambition of Salford City Council to create a linear walking/cycling route linking Oldfield Road to the University Campus. The current plans which place the walking/ cycling route on top of the line of the canal need to be rejected to comply with Salford's Local Plan and Policy HE6.

5. Canals need water

We propose that the line of the canal be exposed and used to create a temporary linear wetland as part of a rainwater management scheme. This would replace the proposed feature that is variously described by the developer as a "Sunken Wetland"; a "Sunken Rain Garden", or a "Linear SUDs feature"



9.1 Masterplan

The masterplan includes two residential units and associated amenity landscaping as well as delivering the first section of the linear park. This will be a key piece of active travel infrastructure for the wider area.

The area is relatively flat allowing step free access across the site with all access points from the north or east. Oldfield road is the closest main route (A5066) with Upper Wharf Street providing vehicular access to the site. The main entrances to the residential blocks are also situated along Upper Wharf Street with private terraces along the rear facade.

The space between the former canal alignment and railway line to the south has been designed as a biodiverse ecological corridor. This ranges from 3-13m wide affording a variety of ecological and screening benefits. Pedestrian street connections link this with Upper Wharf Street between the residential blocks. The sunken rain garden provides a linear SUDs feature running along a portion of the park. An informal natural play area located within the park is easily accessed from Oldfield Road and Upper Wharf Street.

A significant amount of accessible green space incorporating over 100 trees and large swathes of naturalistic planting will make this a haven for wildlife, enhancing the health and well being for local residents and visitors.

Source: Updated Design and Access Statement - Salford Planning Portal 29/02/2024

The linear sunken wetland would be replaced by a navigable canal when funds allowed.

Policy HE6: Canals

In the case of the Manchester, Bolton and Bury Canal and Fletcher's Canal:

A. Development alongside the line of the canal shall facilitate its restoration or, where this is not practicable, provide open space incorporating walking and cycling routes and heritage interpretation features along its line so that the potential for future restoration is retained and people can appreciate the history of the canal; and

B. Development that would prevent or significantly hinder the future restoration of the canal or its towpath will not be permitted....

Developer contributions to the restoration and/or improvement of the city's canals will be sought where appropriate in accordance with policy PC1.

6. Planting trees next to retaining walls

We also note the proposal to plant several trees where, over time, they could affect the stability of the retaining wall that separates the applicant's land from that owned by Network Rail. Reinstating the towpath at this location would reduce this risk to near zero. We observe that Network Rail have not commented on this aspect of the proposed landscaping, as they have focussed on potential leaf fall. Similar concerns apply to the proposal to plant trees near to the canal's wash walls. To do so would hinder the future restoration of the canal.



The railway retaining wall. Approximately 6m of retaining wall, topped by 2m of boundary wall. The heritage towpath is behind the boundary wall. The beaded section indicates ground level. Source: Manchester Bolton & Bury Canal Through Time.

7. Conclusion

MBBCS requests that the developer revisits these parts of their landscape proposal so that they facilitate the restoration of the canal and not impose a significant burden to restoration. MBBCS is of the view that reinstatement of the original towpath, exposure of the canal coping stones, and adding water where it belongs, is entirely practicable and would “facilitate (the canal’s) restoration” and thus make the application compliant with Salford Council’s heritage policy HE6. We believe our proposals to protect and restore heritage features deliver a scheme that is entirely practicable and can be realised within the same financial envelope as the applicant’s proposal.

Going forward MBBCS would *seek* to work with MBB Canal Restoration Partners to attract funds and other resources to make progress towards achieving fully navigable status for this section of canal. Unlocking the Upper Wharf Street site is key to the achievement of the Restoration Partnership’s vision for the canal¹.

We ask the Local Planning Authority (LPA) to impose planning conditions that ensure that the ambitions of the Salford Council Local Plan and planning policies are delivered i.e. HE6, SuDS, Environment, Placemaking, active travel etc. Our template of desirable conditions is appended again at Appendix 2

¹ https://www.mbbcs.org.uk/vision_statement.html

“By understanding and valuing the role of cultural heritage in our lives, we are empowered as a society that acknowledges and benefits from the wide array of advantages offered by our historical past. It's not just about a visit to a medieval castle or a stroll through a historic garden; it's about the everyday encounters with our heritage that serve as pathways to wellbeing. Heritage assets are essential components of our collective wellbeing.²”

Source: The Wellbeing Impact of Cultural Heritage on England's Economy (Historic England, 2024)



Manchester from Kersal Moor, William Wyld, 1852, Royal Collection

The canal to Upper Wharf Street carried the coal that fed the furnaces of the world's first industrial revolution. Restoration represents a unique opportunity for this hidden heritage to become revealed once again and start a new life as a pathway of wellbeing, recreation and biodiversity.

² <https://historicengland.org.uk/research/current/social-and-economic-research/culture-and-heritage-capital/life-satisfaction/>

Appendix 1

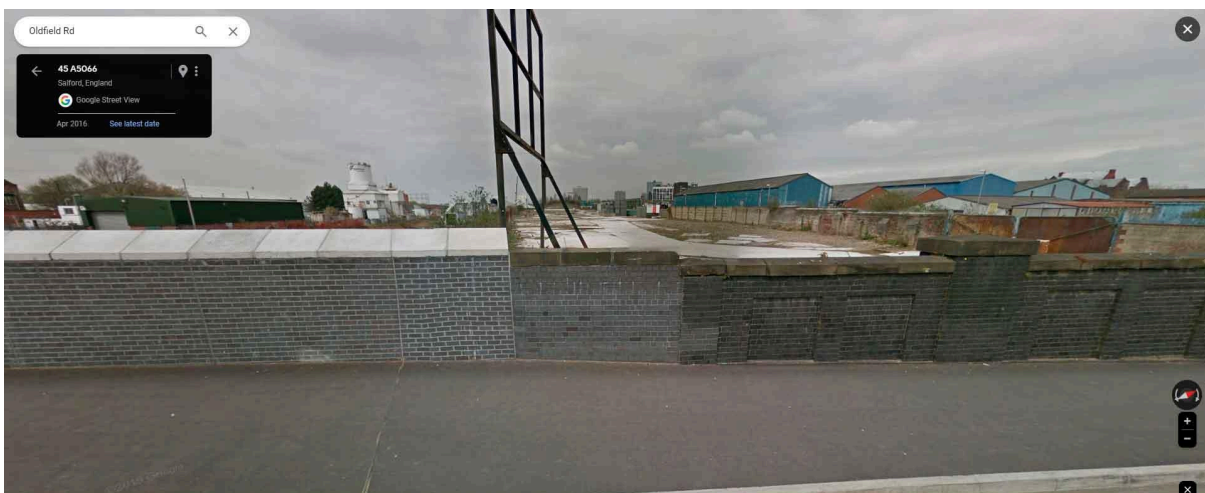
Restoring the heritage towpath entrance

Pictured below is the Google Street Scene image of the entrance to the towpath. This dates from 2014 and clearly shows a bricked up entrance. The location of the entrance can be confirmed from historic maps and photographs. Somewhere between 2014 and 2016 the red brick was replaced by blue engineering brick, presumably as it was seen as a cosmetic improvement.

Historic maps indicate that there may have been a few steps down to the towpath in which case a ramp could be substituted.



Source Google Street View - Oct 2014



Source Google Street View - Apr 2016



Contemporary MBBCS photo of the Towpath entrance. The yellow mat is 2.9 m wide
The rest of the heritage canal parapet wall is an essential safety feature of any restored canal.



View of Lock 5 looking towards the Oldfield Road parapet with Oldfield Dwellings to the left.
Source: H2O Urban's Design and Access Statement.



Lock 5 Head Gates - view towards Oldfield Road

Undated view of the heritage canal bridge parapet and Lock 5 included in section 1.13 of the H2O Urban's Design and Access Statement

CBRE, on behalf of the applicant, quotes NPPF Guidance paragraph 56 to accept our suggested conditions (a) and (e) and reject our other 4 proposed conditions as not

1. necessary;
2. relevant to planning;
3. relevant to the development to be permitted;
4. enforceable;
5. precise; and
6. reasonable in all other respects.

We ask the LPA to accept all our suggested conditions as necessary to ensure restoration is not hindered and all practicable steps are taken to facilitate its reinstatement to navigation.

Suggested template for planning conditions

(a) No construction to commence prior to the developer providing a written scheme of investigation for the archaeology of the site which is approved in writing by the Local Planning Authority.

(b) No construction to commence prior to the developer providing a clear project plan of how restoration of the canal could be undertaken in such a way that minimises rework and expense in removing the proposed hard and soft landscaping and which is approved in writing by the Local Planning Authority

(c) No occupation of the dwellings to be permitted prior to the developer providing a project plan, demonstrating how the canal infrastructure is to be uncovered and the towpath reinstated as a pedestrian path/cycleway, which is approved in writing by the Local Planning Authority

(d) No occupation of dwellings to be permitted prior to the developer providing clear plans that demonstrate how the development would work with the canal reinstated and which are approved in writing by the Local Planning Authority. The expectation being that documents be produced that show how pedestrian and cycle access would be managed in a post restoration era.

(e) No occupation of the dwellings to be permitted prior to the developer providing a scheme to commemorate the heritage of the site and adjacent area within the new public realm which is approved in writing by the Local Planning Authority.

(f) no construction to start on site until there is a written undertaking by the developer that they will actively engage, support and work with Salford Council, MBBCS and other canal restoration partners to prepare and where needed to lead fundraising bids for the restoration of the canal on this site.