# *Inland Waterways & Waste*

## *Waste Core Strategy for Worcestershire*
## *Background Document*

**March 2011**

**Worcestershire County Council**

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The Council is preparing a *Waste Core Strategy*: a plan for how to manage all the waste produced in Worcestershire up to 2027. To help provide a robust evidence base for the Waste Core Strategy the Council has prepared a series of background documents. These outline current thinking and have informed the approach taken in the development of the Waste Core Strategy.

We welcome any comments you would like to make on any of the background documents during the *Publication Document (Regulation 27) Consultation.* The consultation will run from **22nd March – 4th May 2011**.

To make comments, request paper copies of the documents or for further information please contact:

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# Introduction

This paper provides a background to the Worcestershire Minerals and Waste Local Development Framework (LDF) in respect of inland waterways in Worcestershire and their potential to transport waste.

A response (dated 3.11.2008) to the *Refreshed Issues & Options Consultation*, sent on behalf of British Waterways, suggest that in preparation of the Waste Core Strategy reference should be given to:

- *Planning Policy Guidance (PPG) 13 (Transport) in particular paragraph 10, 13 and 45*
- *Waterways & Development Plans (2003)*
- *Waterways for Tomorrow (DETR 2000)*
- *Planning a future for inland Waterways (2001)*
- *Planning for Freight on Inland Waterways (2002).*

As a result this background paper examines these Plans, Policies and Strategies as well as other relevant national, regional and local planning policy. It then considers the potential for the transportation of waste via inland waterways in Worcestershire, making recommendations for the WCS.

# Summary of Inland Waterway Policy Documents

The Government wants to encourage more freight to travel by water than by road, the following documents all show how the Government believe this can be achieved.

- *Waterways & Development Plans (2003)*
- *Waterways for Tomorrow (DETR 2000)*
- *Planning a Future for Inland Waterways (2001)*
- *Planning for Freight on Inland Waterways (2002).*

The following summary highlights points in the above documents related to transporting waste by water. The documents have been summarised under four headings:

- *The Potential of Inland Waterways*
- *Waste & Waterways*
- *Waterways & Planning*
- *Planning Policies relevant to transporting waste by water.*

**The Potential of Inland Waterways**

*"Britain's inland waterways are a national asset and should be retained and conserved for their built heritage and environmental qualities and sustainably developed to encourage best use and maximise the contribution they can make to national, regional and local goals"*[1]

[1] Waterways for Tomorrow (2000)

The Government encourages the transfer of freight from roads to waterborne transport where it is practical, economic and environmentally viable.[2] It wants to maximise the economic, social and environmental contribution waterways make to the quality of life in both urban and rural areas. Encouraging the transfer of freight from roads to waterways has the potential to reduce $CO_2$ emissions, traffic congestion and HGV accidents.

According to British Waterways' response to the *Emerging Preferred Options* consultation, "*Waterborne transport (of passengers and in particular freight) has a role to play in reducing traffic congestion and providing alternative non-car modes of transport improving air quality. It has the lowest carbon emissions of all forms of transport. It has also been demonstrated to be convenient and cost effective in certain circumstances. Waterborne transport of freight is particularly suitable for transporting demolition and construction waste, construction materials, household and commercial waste, recyclates and other low value, bulky, non time sensitive goods and products*" and "*in certain circumstances (depending on distance and number of locks required to travel through) there is a sound economic case (and environmental and social case) for considering freight by water as a viable alternative to road transport. Clearly, this offers benefits including reduced lorry miles, reduced congestion, reduced carbon emission and reduced number of HGV related accidents*" (British Waterways full comments can be seen in Appendix 3).

*Waterways for Tomorrow (2000)* identifies that there is scope to increase the amount of freight carried on inland waterways. There are currently 5,100 km of fully navigable waterways in England and Wales. Consisting mainly of canals and rivers that have been made navigable. "*All types of waterway can have some potential for use for freight transport*."[3]

From the Middle Ages onwards inland waterways were made navigable to provide arteries for trade. However, with the introduction of the railway and road, waterways found it difficult to compete and a decline in waterborne freight occurred. After years of decline the system is now undergoing a renaissance as derelict waterways are being restored, resources devoted to maintaining the historic existing system, and increased effort is put into exploiting the wide range of social, economic and environmental benefits the waterways offer.

Much of the country's inland waterways system is unsuitable for carrying significant volumes of freight as most of the narrow canals have remained unchanged since they were built 200 years ago and cannot take boats wider than 7 feet. However, larger river navigations and canals still carry some freight and could take more traffic. They are likely to be particularly suited to bulk cargoes such as coal, fuel, oil, aggregates, steel and timber whose origins and destinations are accessible by water.

**Waterways & Waste**

Transport of waste by water has stimulated the most recent interest in using waterways for freight. The River Thames is the only inland waterway in the

[2] Waterways for Tomorrow (2000)
[3] Planning for Freight on Inland Waterways (February 2005)

country presently carrying significant quantities of waste materials. On average, 2,500 tonnes per day of municipal waste is loaded onto barges and taken to landfill sites in Essex. One tug and barge convoy journey is the equivalent of 40 to 50 lorry journeys. This traffic, being low value, bulky and non-urgent is ideal for transport by water.[4] Although London is currently the only location in the UK to transport waste by water, British Waterways states that there is potential across the whole of the UK for waste to be transported by water.

Research carried out by the Resource Recovery Forum – Inland Waterways and the Transport of Waste concluded, "*in environmental terms, transport of waste on the Thames has historically performed better than road transport*".[5] Studies have been carried out on the Severn and, by Peel Holdings, on the Manchester Ship Canal to investigate the potential for the transport of waste on these waterways.[6]

The key impact of transporting waste by water is the reduction of road transport. An evaluation of transporting waste on the River Lee navigation in London has proposed that the initiative could save up to 45,000 lorry journeys per year[7]. A proposed partnership between British Waterways, local authorities and private waste management businesses, would use the river to carry waste in 12-tonne sealed containers on a specially converted barge to the energy from Waste Plant at Edmonton.

Inland Waterways Inland Waterways Advisory Council (IWAC) described the waterways a few years ago as 'an undervalued asset'. This is steadily less the case. The system itself is expanding; the opportunities multiplying.[8] The use of waterways for freight is currently being explored by a Freight Study Group set up by the Government to examine cost effective and practical ways of increasing waterborne freight transport.

*Freight on Water: A New Perspective - The Report of the Freight Study Group* concludes that "*there is a very well understood environmental case in support of waterborne transport as an alternative to road transport*."[9] A survey of potential traffic carried out by the group shows a real demand for freight on inland waterways. In light of this the group recommends that waste collection and waste disposal authorities should take a proactive approach to the movement of waste and recyclable materials by water where appropriate.

The Report of the Freight Study Group considered that there is scope to increase the use of the traditional narrow and broad canals for freight movement. Domestic fuel, scrap, waste, canal maintenance and waterside site construction material and aggregates provide some existing traffic and potential for growth. The Group believed that these canals have the potential to reduce commercial vehicles traffic in city centers and residential areas. Water runs through the heart of many cities and large centers of population such as London, Birmingham, Manchester, Nottingham, Coventry and Milton Keynes. One option is the establishment of transshipment points close to where a ring road crosses the

[4] Planning for Freight on Inland Waterways (February 2005)
[5] Resource Recovery Forum - Inland Waterways & the Transport of Waste (2001)
[6] Planning a future for inland waterways: A good practice guide (December 2001)
[7] Waterways for Tomorrow (2000)
[8] Waterways for Tomorrow (2000)
[9] Freight on Water: A New Perspective, A study by the Freight Study Group (June 2002)

waterway. Goods could then be carried through the urban centre by water and be transshipped again for onward distribution by road.

However, British Waterways advises that "*given the use of the waterways by leisure craft, and anglers and the water quality provided by the waterways, the types of goods and materials transported on the waterways and the methods in which goods and materials are transported will be restricted. As a general rule British Waterways will not permit the transfer of Hazardous or Special wastes & materials by water. In addition all boats must be designed to exclude the risk of materials entering / falling into the watercourse - so sealed containers are normally required*."

**Waterways & Planning**

Appendix 3 of *Waterways for Tomorrow (2000)* states there is no dedicated planning policy guidance for inland waterways and outlines Planning Policy Guidance most likely to be relevant to inland waterways and related developments.

The IWAC expressed concern in its *Undervalued Asset Report (June 1997)* that Government Planning Policy paid little attention to the inland waterways[10]. *Planning for Freight on Inland Waterways* (Feb 2005) says to increase the transportation of freight from road to water will require the engagement of the planning process.

British Waterways published Planning for the Future of Inland Waterways: A good practice guide (December 2001) and Waterways & Development Plans (February 2003) to help and encourage planners and policy makers to exploit the potential of the inland waterways & integrate them into Development Plans.

*Planning for the Future of Inland Waterways (2001)* shows how good planning can help support and encourage the use of inland waterways for freight transport. The guide is designed to demonstrate good practice on how the waterways are being brought back into sustainable use, how they can be used successfully as catalysts for economic and social change and how the planning system can be used to promote and implement appropriate development on the waterways. The guide encourages Local Planning Authorities to incorporate policies that acknowledge and support the potential for multi-use of waterway sites so that their full value can be realised.

*Waterways & Development Plans (Feb 2003)* encourages the integration of the inland waterways of England and Wales into the development plan system. The document has two main aims:

- to encourage the local planning authorities to adopt a holistic and comprehensive approach to protecting and promoting the multi-functional nature of inland waterways and;
- To advise local planning authorities on the key planning policy issues relating to waterways.[11]

[10] IWAAC - Undervalued Asset Report (June 1997)
[11] British Waterways: Waterways & Development Plans (Feb 2003)

A further aim of the British Waterways: Waterways and Development Plans is to "*ensure that Local Development Documents, not only protect waterways and related water spaces from inappropriate development, but also encouraging their use and unlock their potential*".'[12] It encourages local planning authorities to identify waterways and their associated corridors, and major waterside sites, as priorities or focus for future detailed action plans and topic plans.

*Waterways and Development Plans (2003)* highlights the need for the planning system to recognize the multifunctional nature of waterways, as well as their integrative characteristics. 'Moreover there is a need to promote greater and more creative integration between waterways and the planning system to deliver their social, environmental and economic benefits by identifying:

- Ways in which better use of planning can assist waterways;
- How the waterways contribute to planning agendas of the metropolitan and urban areas, market towns, coalfield areas, accessible and more remote rural areas, district and region wide, and;
- How the effective use of policy mechanisms can facilitate change.[13]

The suggested role of the regional and local planning authorities for encouraging the transportation of waste by water is as follows;

'It is at the regional level where significant practical steps can be taken to facilitate expansion of the use of inland waterways for freight. Building partnerships between the Regional Assemblies, Government Offices, Development Agencies, Local Authorities, industry representatives, port and Navigation Authorities and the freight transport associations and operators will provide a proactive means of encouraging examination of the potential for waterborne freight. Such forums enable issues to be aired and solutions to be found.'[14]

'At the local level, the Local Authorities that must determine planning applications will then have a very strong basis on which to base their planning decisions. They have a variety of planning tools to apply to planning permissions. These can be used to promote waterborne freight at both the Development Plan and Development Control levels.'[15]

Continuous dialogue between policy-makers, planners and those interested in pursuing the business of moving freight particularly, but not exclusively, by water, is not only beneficial but also essential. Understanding the planning system will assist the freight industry to work with it. Understanding the inland waterways and the potential for waterborne freight will enable the planners to implement policy and plans appropriately in the pursuit of sustainable transport objectives. Water is a realistic option; it should be taken as seriously as rail and road for freight movements.

[12] British Waterways: Waterways & Development Plans (Feb 2003)
[13] British Waterways: Waterways & Development Plans (Feb 2003)
[14] British Waterways: Waterways & Development Plans (Feb 2003)
[15] British Waterways: Waterways & Development Plans (Feb 2003)

***Planning for Freight on Inland Waterways (Feb 2005)* includes ten case studies one of which is the regeneration of Diglis Basin, River Severn, Worcester (p46). See link**
http://www.dft.gov.uk/pgr/freight/waterfreight/pfiw/fullguide.pdf.

## The Transport Act 1968

In their response to an early draft of the Inland Waterways and Waste background document, the Inlands Waterways Association recommended that Worcestershire County Council give reference to the Transport Act 1968 when developing the Waste Core Strategy for Worcestershire.

The main provisions made by the Transport Act 1968 were changes to the use of facilities controlled by the state-owned British Waterways. Reflecting the decline in the use of canals and rivers for freight distribution, waterways were divided into three categories:

- Commercial carriage of freight (Commercial Waterways);
- Cruising waterways;
- The remainder (Remainder Waterways)[16]

With a view to securing the general availability of the commercial and cruising waterways for public use, it shall be the duty of the Waterways Board, to:

- Maintain the commercial waterways in a suitable condition for use by commercial freight-carrying vessels; and

- Maintain the cruising waterways in a suitable condition for use by cruising craft, that is to say, vessels constructed or adapted for the carriage of passengers and driven by mechanical power.

The Act recognized the value of the waterway network for leisure use, and set up the Inland Waterways Amenity Advisory Council now the IWAC to:

- Advise the Waterways Board and the Minister on any proposal to add to or reduce the cruising waterways;
- Consider, and, where it appears to them to be desirable, to make recommendations to the Waterways Board or the Minister [with respect to, any other matter:

    - Affecting the use or development for amenity or recreational purposes, including fishing, of the cruising waterways[17];

A particularly important section of the Transport Act 1968 is that of Schedule 12, Part 1 setting out the Commercial Waterways. Within this it identifies the River

[16] Office of Public Sector Information (OPSI) Transport Act 1968 (c.73) (2009) http://www.opsi.gov.uk/RevisedStatutes/Acts/ukpga/1968/cukpga_19680073_en_1
[17] Office of Public Sector Information (OPSI) Transport Act 1968 (c.73) (2009) http://www.opsi.gov.uk/RevisedStatutes/Acts/ukpga/1968/cukpga_19680073_en_1

Severn from Stourport to its junction with the Gloucester and Sharpness Canal at Gloucester as a commercial waterway[18].

# National Planning Policies

**Planning Policy Guidance (PPG) 13: Transport**
The paragraphs British Waterways recommended Worcestershire County Council to give reference to from PPG 13 when developing the Waste Core Strategy are outlined below.

> **Paragraph 10:** Local Transport Plans (for authorities outside London) have a central role in co-ordinating and improving local transport provision. Guidance on full *Local Transport Plans (DETR March, 2000)* provides advice on the transport measures which should form part of the local approach to the integration of planning and transport. *The Transport Act 2000* makes the preparation of local transport plans a statutory requirement.
>
> **Paragraph 13:** To promote more sustainable patterns of development and make better use of the previously developed land, the focus for additional housing should be existing towns and cities*. PPG3* requires local planning authorities to build in ways which "exploit and deliver accessibility by public transport to jobs, education and health facilities, shopping, leisure and local services". *PPG3* also requires local authorities to "place the needs of people before ease of traffic movement in designing the layout of residential developments" and to "seek to reduce car dependence by facilitating more walking and cycling, by improving linkages by public transport between housing, jobs, local services and local amenity, and by planning for mixed use"[19]
>
> **Paragraph 45:** The Government has set out its policy framework on freight in its *Sustainable distribution Strategy (1999)*. While road transport is likely to remain the main mode for many freight movements, land use planning can help to promote sustainable distribution, including where feasible, the movement of freight by rail and water. In preparing their development plans and determining planning applications, local authorities should:
>
> 1. Identify and, where appropriate, protect sites and routes, both existing and potential, which could be critical in developing infrastructure for the movement of freight (such as major freight interchanges including facilities allowing road to rail transfer or for water transport) and ensure that any such disused transport sites and routes are not unnecessarily severed by new developments or transport infrastructure. In relation to rail use, this should be done in liaison with SRA which is best placed to advise on the sites and routes that are important to delivering wider transport objectives;
> 2. Where possible, locate developments generating substantial freight movements such as distribution and warehousing, particularly of bulk goods, away from congested central areas and residential areas, and ensure adequate access to trunk roads;

[18] Office of Public Sector Information (OPSI) Transport Act 1968 (c.73) (2009) http://www.opsi.gov.uk/RevisedStatutes/Acts/ukpga/1968/cukpga_19680073_en_1
[19] Planning Policy Guidance 13 - Transport (March 1994)

3. Promote opportunities for freight generating development to be severed by rail or waterways by influencing the location of development and by identifying and where appropriate protecting realistic opportunities for rail or waterway connections to existing manufacturing, distribution and warehousing sites adjacent or close to the rail network, waterways or coastal/ estuarial ports;
4. On disused transport sites consider uses related to sustainable transport first, before other uses.

**Planning Policy Statement 1 (PPS1): Delivering Sustainable Development**

This Planning Policy Statement sets out how planning should contribute to the delivery of sustainable development. Although inland waterways are not specifically referred to, nor the transport of waste, it does state that 'Regional Planning Bodies and Local Planning Authorities should ensure that development plans contribute to global sustainability by addressing the causes and potential impacts of climate change - through policies which reduce energy use, reduce emissions (for example, by encouraging patterns of development which reduce the need to travel by private car, or reduce the impact of moving freight), promote the development of renewable energy resources, and take climate change impacts into account in the location and design of development'[20]. As a result, by transporting waste via inland waterways this may help reduce the emissions from freight, contributing to reducing the impacts of climate change.

**Planning Policy Statement 10 (PPS10): Planning for Sustainable Waste Management**

PPS10 sets out how planning should contribute to the delivery of sustainable waste management. The only links to the movement of freight via inland waterways in PPS10 is that it encourages alternative modes of transport to that of road transport. It states that 'in deciding which sites and areas to identify for waste management facilities, waste planning authorities should: (i) assess their suitability for development against each of the following criteria', this includes: 'the capacity of existing and potential transport infrastructure to support the sustainable movement of waste, and products arising from resource recovery, seeking when practicable and beneficial to use modes other than road transport[21]'

# Regional Policy

**Regional Spatial Strategy for the West Midlands (2008)**

[20] ODPM (2005) *Planning Policy Statement 1: Delivering Sustainable Development*, HMSO, Norwich, http://www.communities.gov.uk/documents/planningandbuilding/pdf/planningpolicystatement1.pdf [Accessed 05.10.2009]

[21] ODPM (2005) *Planning Policy Statement 10: Planning for Sustainable Waste Management*, TSO, Norwich, http://www.communities.gov.uk/documents/planningandbuilding/pdf/147411.pdf [Accessed 05.10.2009]

Following the change of government in May 2010, the Secretary of State has expressed his intention to revoke the Regional Spatial Strategies. This is material planning consideration. However, the evidence upon which the RSS and RSS phase 2 revision were based is still considered to be valid and the ideas in the RSS reflected national policy; as such, they are still being considered in the development of the Waste Core Strategy.

The RSS has a variety of policies which related to inland waterways, these are:

**POLICY QE5: Protection and enhancement of the Historic Environment**
Policy QE5 encouraged Development Plans and other strategies to identify, protect, conserve and enhance the Region's diverse historic environment and manage change in such a way that respects local character and distinctiveness. Of particular historic significance related to inland waterways is that of the historic transport network, and Strategic river corridors (Severn, Wyre, Trent and Avon).

It goes on to encourage conservation led regeneration outlining the canal network as having particular potential[22].

**POLICY QE9: The Water Environment**
In particular regard to inland waterways Policy QE9: The Water Environment part (vii) sought to maintain and enhance river and inland waterway corridors as key strategic resources, particularly helping to secure the wider regional aims of regeneration, tourism and the conservation of the natural, built and historic environment[23].

**POLICY WD3: Criteria for the Location of Waste Management Facilities**
Policy WD3 part (ii) explicitly related to use of inland waterways for use by the waste industry. It stated that wherever possible and consistent with the principles of Best Practicable Environmental Option and Proximity, LPAs should encourage the use of rail and water transport in preference to road transport[24].

**POLICY T10: Freight**
Policy T10 sought to improve the efficiency of freight movement and support the development of Regional Logistics Sites. In particular, with regard to inland waterways, it aimed to encourage the use of rail and inland waterways for freight. It went on to state that Local Authorities and other agencies should co-operate to develop Regional Freight Strategy covering all forms of freight transport including water[25].

**West Midlands Regional Freight Study - Final Report**

According to the West Midlands Regional Freight Study there are approximately 5,000km of navigable inland waterways in Britain. Out of this total, around

[22] GOWM (2008) Regional Spatial Strategy for the West Midlands, TSO, London, http://www.wmra.gov.uk/documents/RSS%20Full%20Doc%20Jan%2008.pdf
[23] GOWM (2008) Regional Spatial Strategy for the West Midlands, TSO, London, http://www.wmra.gov.uk/documents/RSS%20Full%20Doc%20Jan%2008.pdf
[24] GOWM (2008) Regional Spatial Strategy for the West Midlands, TSO, London, http://www.wmra.gov.uk/documents/RSS%20Full%20Doc%20Jan%2008.pdf
[25] GOWM (2008) Regional Spatial Strategy for the West Midlands, TSO, London, http://www.wmra.gov.uk/documents/RSS%20Full%20Doc%20Jan%2008.pdf

2,100km are classified as 'commercial waterways', which means they are either used for the movement of freight or are deemed to be capable of carrying freight in a commercial ways[26].

The West Midlands Regional Freight Study states that there is a fairly extensive network of inland waterways in the West Midlands, with a large majority comprising of narrow canals classified as 'non commercial' and as a result these are not deemed capable of carrying freight commercially[27].

According to the West Midlands Regional Freight Study, the only 'commercial waterway' in the West Midlands is a 38km section of the River Severn from Stourport down towards Gloucester. The absence of a network of commercial inland waterways in the West Midlands means that only small vessels with a limited cargo carrying capacity can operate to and from the West Midlands. The West Midlands Regional Freight Study then suggests that given these limitations, the West Midlands should recognise that large scale use of the inland waterway network as a means of moving freight into, out of and through the region is neither an economically viable or realistic mode of freight transport[28].

However, the West Midlands Regional Freight Study does recognise that some small scale niche market opportunities are likely to be available, particularly on the 38km 'commercial waterway' section of the River Severn from Stourport to Gloucester[29].

# Local Policy

**Worcestershire County Structure Plan (Saved Policies)**
The Worcestershire County Structure Plan has a variety of saved policies which could apply to the use of Inland Waterways in the transportation of waste. These policies include:

**Location of Employment Uses in Class B8 – Policy D.24**
The location of new wholesale warehouses and distribution centre development within class B8 of the Use Classes Order 1987 (as amended) will be such that access to railways and/or waterways termini is maximised. Any change in navigation status of rivers will be subject to the requirements of the Environment Agency[30].

**Freight/Goods Transfer – Policy T.15**

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[26] MDS Transmodal Limited and Mott Macdonald (2005) *A Recommended West Midlands Regional Freight Strategy – Final*, http://www.wmra.gov.uk/documents/Planning%20and%20Regional%20Spatial%20Strategy/RSS%20Revision/RSS%20Revision%20Phase%202/Regional%20Freight%20Study%20Final%20Report_2.pdf [Accessed 05.10.2009]
[27] See footnote 26
[28] See footnote 26
[29] See footnote 26
[30] Worcestershire County Council (2001) *Worcestershire County Structure Plan 1996-2011*, Worcestershire County Council, Worcester, http://www.worcestershire.gov.uk/cms/environment-and-planning/strategic-planning/structure-plan.aspx [Accessed 05.10.2009]

The transfer of freight, waste, aggregates and minerals from roads to other forms of transport such as rail, water and pipeline will be promoted in order to reduce the impact on the highway network and the environment[31].

The location of new industrial and warehouse development will be sited such that access to railways and/or waterways and pipe termini is maximised.

**River Severn – Policy T.18**
The improvement of the River Severn up to Worcester for freight transport, where it is environmentally and ecologically acceptable, will be supported[32].

**Location of Waste Handling and Treatment Facilities – Policy WD.2**
Facilities for the handling and treatment of waste should be located as near to its place of origin as possible. They should not conflict with the aims and policies in the Structure Plan, and should preferably be located within buildings on existing or proposed industrial estates where the infrastructure and surrounding uses are appropriate. Where the design or operation of the facility makes this inappropriate, the following areas should be considered:

I. Derelict or despoiled areas;
II. Areas close to arisings;
III. Working or worked out mineral or landfill sites;
IV. Existing waste management sites; or
V. Sites located close to railways or water transport wharves or major junctions in the road network[33]

## District Councils' Core Strategies

**Bromsgrove (Draft Core Strategy 2 January 2011)**
Road network in the District are far more extensive and developed than rail and water networks. However, the availability and rising costs of fuel resources, together with the environmental impacts of road transport in general are causing freight operators to consider other, more sustainable transport modes for moving freight including for bulk goods and waste, such as by rail or water. The Districts Inland Waterway network including the Worcester and Birmingham Canal may offer long term opportunities for the sustainable movement of freight through the District.

The Strategy states that "Sustainable transport will be a fundamental part of new development. This is founded on the basic principles of reducing the need to travel and, where travel is necessary, increasing in the use of sustainable transport modes" and Core Policy 14: Sustainable Transport sets out that:

- All major developments will be accessible by safe and sustainable modes of transport; and
- The use of travel plans will be encouraged to secure the provision of sustainable travel choices

[31] See footnote 30
[32] See footnote 30
[33] See footnote 30

**Redditch Borough**
According to Redditch Borough Council they have no waterways capable of any form of transportation and therefore Redditch Borough Council has not identified sites for such uses in their Revised Preferred Draft Core Strategy (January 2011).

**Wyre Forest (Adopted Core Strategy December 2010)**
The Strategy states that the District's inland waterway network including the Staffordshire & Worcestershire Canal and the Rivers Severn and Stour also offer longer term opportunities for the sustainable movement of freight through the District.

The main focus however is on *Regenerating the Waterways* (Policy CP15) and the role of waterways in green infrastructure, biodiversity and tourism.

**South Worcestershire (Worcester City, Wychavon and Malvern Hills)**
The use of inland waterways by freight transport has not been referred to in the "South Worcestershire Joint Core Strategy Emerging Preferred Options" (2008).

## Local Transport Plan 2 (2006-2011)

The Local Transport Plan states that:

> " The River Severn is a historic transport corridor which is now used predominantly for leisure boat traffic. However, there is potential for greater use to be made of the waterway for freight movement, and a £2.5 million project for the transfer of sand and gravel by RCM Material in South Worcestershire has been developed with the assistance of a DfT grant. This will enable 2.75 million tonnes of aggregates to be moved by barge between Ripple and Ryall, saving 340,000 lorry movements on the local road network. This project highlights the potential that the river has for freight transfer, and the County Council will support further such initiatives.

It sets out "**Policy FQP3: To explore the greater use of rail and inland waterways for the carriage of freight within the County."**

# Worcestershire context

As identified in the West Midlands Regional Freight Study the River Severn is a 'commercial waterway' and according to the Inland Waterways Association the River Avon is also an operational river navigation, capable of carrying commercial traffic including waste. The River Avon is navigable for 45 miles from Tewkesbury to Stratford on Avon. The 'commercial waterway' section of the River Severn is 38km long and in Worcestershire the River Severn runs from Bewdley through Stourport on Severn down to Worcester City, through Upton upon Severn, past Ryall and Ripple towards Gloucester.

However except for the River Severn and River Avon there is a lack of 'commercial inland waterways' in Worcestershire, and consequently only small vessels with a limited capacity can operate on these inland waterways. Furthermore, this is the same for the whole of the West Midlands Region and as a result large scale use of freight between Worcestershire, the region and

nationally will be limited and according to the West Midlands Regional Freight Study, will neither be economically viable or a realistic mode of freight transport, except along the section of the River Severn and parts of the River Avon identified as a 'commercial inland waterway'. As a result it is likely that only small scale niche market opportunities will be viable, such as a waste transfer station situated next to an inland waterway which then transfers the waste via vessels to a larger waste transfer station for bulking and onward transport or direct to a processing plant also situated along the inland waterway.

A current operational example of where a small scale niche market opportunity has arisen for the use of freight on the River Severn is for the transportation of aggregates at Ryall quarry to Ripple quarry where it is then processed, before onward transport by road. Although this is not for the transportation of waste, aggregates are similar in that it is a high volume, low value product and as a result illustrates the feasibility of small scale freight operations in Worcestershire, particularly along the 'commercial inland waterway' of the River Severn.

The West Midlands Regional Freight Study identifies a possible trial for '100,000 tonnes per annum of household waste from the towns in north Worcestershire to be transported to an incinerator in Wolverhampton' via inland waterways. The County Council has no information on the origin of this proposal or evidence that it was ever seriously considered. Although it is willing to consider the principle, it has no knowledge of any proposal to do so, or how, or where it could be done. The reference illustrates the aspirations to transport waste via inland waterways, reflected in Government policy, but appears to demonstrate that large scale projects such as this may not feasible.

Although canals are classified as 'non commercial inland waterways' there may still however be opportunities for small scale operations. The Droitwich Canals Trust has informed us that the 'Droitwich Barge Canal will be particularly suited to freight transport of bulk waste. Waste could be transported from the centre of Droitwich to the River Severn for onward shipment. This could be tied in with proposals to use the River Severn for transporting waste from Wyre Forest and Worcester'.

However an important issue related to the use of canals in transporting waste is that it is important to retain suitable loading points. The Droitwich Canals Trust suggests that "*currently there is a slipway at the former gasworks site in Hampton Road, close to Droitwich Spa Railway Station and the A38 Roman Way bypass. This makes an ideal access point but the area is earmarked for future mixed use development. Alternatively, access could be gained near Droitwich Leisure Centre or immediately off Ombersley Way, close to the A38 Roman Way Droitwich bypass*".

In principle this is something that the WCS would like to encourage, and Wychavon District Council have indicated that they would support the promotion of the movement of waste utilising canals. However, particular local issues would make the suggested locations inappropriate as one site is allocated for development in the Droitwich Canals' Supplementary Planning Guidance and the other is currently in leisure use which would be incompatible with a waste loading point.

The County Highways Department have also indicated that they are in full support of the use of inland waterways to transport freight.

# Conclusions

In summary, this background paper has discussed planning policy and guidance at national, regional and local levels. It has shown that the use of inland waterways for use by freight is supported at all levels of policy, except in the current District Core Strategies in Worcestershire where freight transport along inland waterways are not discussed.

The River Avon is navigable throughout the County and the River Severn as far north as Stourport-on-Severn. The canal network is extensive and connects to systems to the north, south and east of the County. Whilst there may be some limitations on vessel size due to locks on or between these waterways, consideration must be given by the Waste Core Strategy to utilising waterways where possible, including the possibility of developer contributions to upgrading of locks or other infrastructure where necessary and viable.

This background paper suggests that the WCS should include policies to encourage and promote the use of inland waterways for the movement of waste, where it is realistic and feasible to do so, this could be for small scale niche market opportunities, particularly along the 'commercial inland waterway' of the River Severn, downstream from Stourport, parts of the River Avon and the Droitwich Canal.

The Waste Core Strategy can promote the movement of waste by water through its vision and objectives, policies and careful consideration of the locations it identifies as "*areas of search*". Reducing the need to move waste by road should be an integral driver behind the direction of the Strategy, and movement of waste by more sustainable transport methods such as water can play a key role in achieving this.

When identifying areas of search, locations should be assessed for the possibility of connections to water transport networks and those locations with existing or potential for future connections should be given priority over locations with only road connections. This is considered in the background document "*Identifying areas of search*" which is available at www.worcestershire.gov.uk.

This should then be supported by policies in the Waste Core Strategy to ensure that both proposals within the *areas of search* and at windfall sites maximise the potential for the movement of waste by water.

## List of Acronyms

| | |
|---|---|
| **IWAC** | Inland Waterways Advisory Council |
| **LDF** | Local Development Framework |
| **PPG** | Planning Policy Guidance |
| **PPS** | Planning Policy Statement |
| **RSS** | Regional Spatial Strategy |
| **WCS** | Waste Core Strategy |

## Appendix 1: Worcestershire Waste Core Strategy Background Documents

To help provide a robust evidence base for the Waste Core Strategy the Council has prepared a series of background documents. These outline current thinking and have informed the approach taken to date in the development of the waste core strategy. All of these background documents are *living document* and are in a state of development and comments are invited on all available documents during the consultation period.

**Key Themes**

- *Towards a Vision Statement*: sets out the vision which is driving the Waste Core Strategy and details how it has evolved through consultation process.

- *Spatial Portrait:* provides additional detail to the spatial portrait set out in this consultation. It includes a description of the County and the local factors that need to be taken into account in developing the Waste Core Strategy.

- *Spatial Strategy:* Set out how the Spatial Strategy for the WCS has been developed

- *Arisings and capacity gap:* considers waste arisings in Worcestershire and makes projections about future arisings, treatment capacity and the need for facilities.

- *Monitoring Baseline*: Establishes the baseline for indicators set out in the WCS monitoring schedule and makes recommendations for those indicators that are not currently monitored

- *Identifying 'areas of search'*: sets out the approach to identifying locations suitable for waste management development, termed 'areas of search' and details all of the alternatives methods considered. It lists all potential locations assessed and details why they were, or were not, considered suitable for waste management development. This document has been informed by *ERM Industrial Estate Report.*

- *Climate Change:* is intended to form a basis for addressing climate change issues in the Waste Core Strategy. It considers mitigation through the reduction of greenhouse gas emissions, energy demands and the adaptation of waste management facilities to climate change.

- *Links with Districts & Neighbouring Local Authorities Plans and Strategies:* identifies the aspects of the guidance 'Creating Strong, Safe and Prosperous Communities' which are relevant to the production of the Waste Core Strategy. As a result of the guidance, this paper goes on to examine the links to waste in Worcestershire's Districts and neighbouring Local Authorities plans and strategies. It also evaluates what these links mean for the Waste Core Strategy.

- *Waste Sites in Worcestershire:* details existing waste management operations in Worcestershire and analysis of the relationship between size and

throughput. In order to gain this information, the majority of known waste sites in the County were visited between September 2008 and July 2009. During these visits operators were asked about any issues currently faced, any future changes anticipated, these meetings are summarised in the report.

- *Inland Waterways:* The document was developed in response to consultation comments received on behalf of British Waterways regarding the Worcestershire County Council Waste Core Strategy: Refreshed Issues & Options Consultation. It sets out the policy context relating to Inland Waterways in Worcestershire.

- *Waste Freight by Rail:* considers the potential for movements of waste by rail in Worcestershire.

**Waste Streams**

- *Municipal Waste:* sets out the national and local policy context. It also includes details of the waste arisings and available capacity for treatment of municipal waste within the County.

- *Commercial and Industrial Waste:* sets out the national and local policy context. It also includes details of the waste arisings and available capacity for treatment of municipal waste within the County.

- *Construction and Demolition Waste:* sets out the national and local policy context. It also includes details of the waste arisings and available capacity for treatment of municipal waste within the County.

- *Agricultural Waste:* considers waste arising from agricultural activities in Worcestershire. It examines what agricultural waste is, how it is treated and explores the planning permitted development rights. and identifies the potential options for making provision through the Waste Core Strategy.

- *Hazardous Waste:* The document considers hazardous waste arising in Worcestershire. It includes information relating to hazardous waste in a national and regional policy context and includes details of the demand and available capacity for the treatment of hazardous waste within the County.

- *Waste Arisings from Healthcare and Related Activities - Clinical Waste and Low Level Radioactive Waste:* considers waste arising from health care and related activities, focusing on Clinical waste; and Non-nuclear low level radioactive waste. It includes information relating to clinical waste and non-nuclear low level radioactive waste in a policy context. It also includes details of the demand and available capacity for treatment of clinical and non-nuclear low level radioactive waste within the County.

  Annex I considers low level radioactive waste from the nuclear industry in more detail, however it is not felt to be a significant issue in the County and is, therefore, not considered in the main body of the report.

**Management Facilities**

- *Types of Facilities:* is intended to be a simple guide that gives an overview of the processes that tend to happen at a range of different facilities and lists the

things that might need to be thought about when deciding where a facility would be best situated. It also sets out some of the possible impacts and benefits of each type of facility.

- *Landfill* includes background data and considers issues around types of landfill and the policy context. It also details of the demand and available capacity for landfill within the County, based on EA data and the Council's own research.

- *Metal Recycling Sites:* considers all sites in Worcestershire involved in the recycling of metal, this includes sites which sort, bulk and/or process metal and any other sites that form part of the chain of processes of recycling waste metal into a material which can be re-used. It sets out the context and background data relating to metal recycling, detailing the demand and available capacity for metal recycling within the County.

- *Waste Transfer Stations:* considers Waste transfer stations, looking at the current need and capacity in Worcestershire and wider policy context.

- *Resource Recovery from Biodegradable Waste - Composting and Anaerobic Digestion* The document considers composting and anaerobic digestion. These treatment options are considered in the same document as they both offer the opportunity to recover resources from biodegradable waste. It sets out the context and background data relating to composting and anaerobic digestion.

- *Recovering Energy from Waste - Biological and Thermal Treatment Technologies:* sets out the context and background data relating to biological and thermal technologies for recovering energy from waste including anaerobic digestion, incineration and refuse derived fuels. There is some overlap with the Worcestershire Waste Core Strategy Background Document: Resource Recovery from Biodegradable Waste: Composting and Anaerobic Digestion.

- *Waste Water Treatment Infrastructure:* examines the need for waste water treatment infrastructure in Worcestershire. It includes information relating to waste water treatment policy context. It also proposes a possible way forward for the potential issues regarding who is responsible for what aspects of managing waste water treatment and related development.

## Appendix 2: Consultation Undertaken

**Representations on the Background Document Consultation Draft**
The following parties were contacted and asked to comment on the consultation draft of this background document (all of these bodies are involved in the management and regulation of inland waterways or in related fields):

- Development Control (County Council)
- Alder King Planning Consultants
- Avon Navigation Trust
- British Waterways
- Mr Peter Davenport (lead for transport in West Midlands - WMRA)
- Droitwich Canals Trust
- Inland Waterways Association
- Bromsgrove District Council
- Redditch Borough Council
- Malvern Hills District Council
- Worcester City Council
- Wychavon District Council
- Wyre Forest District Council

The draft will be amended in response to the comments made and a list of the comments and responses will be included as an appendix in the final background document.

Via this initial consultation the following organisations were identified as also having an interest in inland waterways and as a result were suggested as further consultees:

- Advantage West Midlands
- English Heritage
- Natural England
- Sustrans
- The Severn Navigation Restoration Trust Ltd
- Worcestershire Wildlife Trust

These organisations will also be contacted and asked to comment on the consultation draft of this background document.

**Further Consultation**
This document will provide supporting evidence for the Waste Core Strategy. Comments on this background document will be welcome at any stage prior to the submission of the Waste Core Strategy to the Secretary of State in Spring 2011, however early comment is encouraged in order for these to be fully considered in the development if the Core Strategy.

Consultations on the Waste Core Strategy will be held at the following stages:

Autumn 2009: The Waste Core Strategy Preferred Options
Early 2011: Submission Draft

but additional, focused consultations will be held with specialist interests throughout its development. Any assistance you can give us with regard to the use of Inland Waterways would be most welcome.

For further information, copies of other published background papers or to join in the Waste Core Strategy for Worcestershire consultation please contact Nick Dean,  Minerals and Waste Team Leader, Planning at Worcestershire County Council, County Hall, Spetchley Road, Worcester, WR5 2NP, telephone (01905) 766374 or email wcs@worcestershire.gov.uk.

## Appendix 3: Consultation Responses

**Bromsgrove District Council**
Bromsgrove District Council note that the Inland Waterways and Waste background document shows that Worcestershire County Council is aware of the relevant policies and documents that will affect their Waste Core Strategy. However, Bromsgrove District Council has suggested that it will be useful if the background document could relate to Worcestershire such as:

- To consider canal areas in the County that worth protecting/enhancing.
- Sites that may be suitable for water freight transport.
- As canals run through the rural areas in Bromsgrove district and linking it with Birmingham, it may be a good idea to promote sustainable transport in or by canals/waterways (such as walking, cycling and boat-buses) and also as a means of improving the accessibility of residents in rural areas.
- To consider the possibility of having floating classrooms?

Bromsgrove District Council also state that no sites were identified in the draft Bromsgrove Core Strategy for future development of transporting freight by water.

**Droitwich Canals Trust**
Droitwich Canals Trust Welcomes moves to use inland waterways for the movement of freight. Droitwich Barge Canal will be particularly suited to freight transport of bulk waste. Waste could be transported from the centre of Droitwich to the River Severn for onward shipment. This could be tied in with proposals to use the River Severn for Transporting waste from Wyre Forest and Worcester.

It will be important to retain suitable loading point for goods. Currently there is a slipway at the former gasworks site in Hampton Road, close to Droitwich Spa Railway Station and bear the A38 Roman Way bypass. This makes an ideal access point but the area is earmarked for future mixed use development. Alternatively, access could be gained near Droitwich Leisure Centre or immediately off Ombersley Way, close to the A38 Roman Way Droitwich bypass. Early identification of which site would be most suitable is recommended.

**Redditch Borough Council**
Redditch Borough has no waterways capable of any form of transportation and therefore Redditch Borough Council has not identified sites for such uses.

**The Inland Waterways Association**
The Inland Waterways Association welcomes the County Council's positive approach to the issue of moving waste by sustainable means and to draft a specific background paper on the topic. They have the following observations regarding this background papers content:

1. The Inland Waterways Amenity Advisory Council (IWAAC) has now been renamed as the Inland Waterways Advisory Council (IWAC) and its role strengthen by recent legislation. It is now the Government's own advisory body on waterway matters and thus their documents are deemed to be official Government thinking.

2. Waterways for Tomorrow is currently under review by DFERA and it is to be strengthened in light of the need to move to more sustainability. This is likely to be in the form of a subsidiary document and is expected to be published later this year.
3. Out of the key documents the Transport Act 1968 is missing from the list.

Furthermore, the Inland Waterways & Waste background paper is clearly focused on the River Severn but there are two operational river navigations in Worcestershire, the other being River Avon and this is capable of carrying commercial traffic including waste. It is operated by the Avon Navigation Trust and the Inlands Waterways Association believes that the County Council should also seek their views. (*There views have been sought by the County Council but no response has been received*).

**British Waterways**

In response to the Emerging Preferred Options consultation carried out between November 2009 and February 2010, British Waterways provided the following response to the free-text sections of the consultation questionnaire:

**Q4 "Do you think that we should develop Preferred Options on the basis of defining what waste management facilities would be acceptable where on the basis of: a. size; b. broad kind; c. specific type; d. any other method; or e. dont know?" (option d selected)**

BW would promote the the acceptablity of waste management facilities on general planning grounds and the environmental sustainability of the site. Waterborne transport (of passengers and in particular freight) has a role to play in reducing traffic congestion and providing alternative non-car modes of transport improving air quality. It has the lowest carbon emissions of all forms of transport. It has also been demonstrated to be convenient and cost effective in certain circumstances. Waterborne transport of freight is particularly suitable for transporting demolition and construction waste, construction materials, household and commercial waste, recyclates and other low value, bulky, non time sensitive goods and products. The LDF should therefore give recognition to the role of the waterways and their towpaths for reducing traffic congestion, improving air quality and providing alternative non-car modes of transport through waterborne transport.

BW has a general policy of seeking to ensure that LPA's give emphasis to the need to promote and consider alternative modes of transport, especially water transport. In the interest of sustainable development British Waterways also encourages waterside sites to utilise their location for waterborne transport, subject to impact on navigation and amenity etc. Waterborne transport also has a role to play in reducing traffic congestion and improving air quality.

In London, British Waterways is promoting the use of canals for freight transport, in accordance with the London Plan, and with TfL jointly commissioned Peter Brett Associates to assess the opportunities for the transport of waste, recyclates and construction materials on the West London Canal Network (WLCN). The report concludes that "there are relatively few sites along the network which can process or handle waste or recyclates, but there are opportunities to develop further facilities".

This work revealed that in certain circumstances (depending on distance and number of locks required to travel through) there is a sound economic case (and environmental and social case) for considering freight by water as a viable alternative to road transport. Clearly, this offers benefits including reduced lorry miles, reduced congestion, reduced carbon emission and reduced number of HGV related accidents. Copies of the full report and the Executive Summary are available on the Transport for London website at: http://www.tfl.gov.uk/tfl/initiatives-projects/freight/report.shtml.

The construction cycle for waterside development could potentially be serviced from the canal. Construction waste can be removed by water and building materials and plant can be delivered by water as demonstrated by the London Arena Site in London Docklands and the Guardian Headquarters building on the Regents Canal at Kings Cross. During occupation there may also be an opportunities for domestic and commercial waste and recyclables to be transported from waterside sites to a Waste Transfer Station by water.

There are a few operations currently underway involving the movement of waste by water: A pilot scheme was trialled in Hackney known as Waste by Water (for domestic/ commercial waste - report attached) which would have been successful, but for the nature of the vehicles used to transport the waste, as double or triple handling renders the use of the canal too inefficient. However Powerday's (at Old Oak Siding, Willesden Junction, LB Hammersmith & Fulham - see www.powerday.co.uk ), a waste handling company, are due to launch a new inter-modal vehicle which will improve the transfer of waste from road to barge and will make schemes such as this more viable. Powerday's also process construction waste into aggregates which can then be transported back out to development sites whether by water, rail or road.

At present the focus is on construction materials and waste where the source and destination of the materials are adjacent to the canal. For this potential to be realised it is vital that future developments are designed to enable the collection of domestic waste and recyclables and delivery of materials. The waste and recyclables may then be transported to a waterside waste management facility and the materials would ideally come from a waterside minerals site. Some waste management and mineral and construction material facilities would therefore need to be provided on the waterside.

Whilst a lot of the policy support, research and best practice case studies cited are London based they illustrate the potential for other locations with significant inland waterways in the UK, including South Worcestershire, providing it does not restrict the leisure and tourism use of the canal. National Planning Policy Guidance in PPS 13 -Transport, seeks to encourage the use of waterways and rail in place of roads whenever practicable.

The use of inland waterways for commerce and recreation is supported through Policy TRAN 8: Ports and Inland Waterways of the Regional Transport Strategy (RTS) in RPG10 which was adopted in 2001 and is due to be superseded by the Regional Spatial Strategy. Other than comments in relation to ports, the only reference in the draft RSS or the Secretary of States Proposed Modifications is Para 5.1.27, which states "developments which generate high volumes of freight

movements should be encouraged to locate close to appropriate rail or water freight facilities to support more sustainable distribution in the South West." Given the national and past regional support for water freight this is considered weak and the Core strategy should be sure to make reference to national policy and guidance with regard to promoting water transport.

**Q5 "Do you think that it would be useful to develop Preferred Options which include policies to address the following: a. the restoration and after-care of waste sites; b. control of landfill mining; c. control of "landscaping" and "noise mounds"; d. description of what Councils in Worcestershire should require in connection with waste deposited under Permitted Development rights; and e. clarification of a county-wide approach to Local Recyclable Collection Points?" Answered yes to all options.**

In June 2000, the Government published 'Waterways for Tomorrow' (DETR), which set out the Government's wish to "promote the inland waterways, encouraging a modern, integrated and sustainable approach to their use. We want to protect and conserve an important part of our national heritage. At the same time, we want to maximise the opportunities the waterways offer for leisure and recreation; as a catalyst for urban and rural regeneration; for education; and for freight transport." This document is currently being revised by government. Early drafts indicate an intention of Central government to continue its emphasis in this area. In furthering this policy BW would need to assess whether a freight proposal will be considered acceptable there are a number of key issues to be considered.

These issues could be used to inform the policy documents as part of a sustainability agenda. Our considerations are listed below:

1. Size of boats

The current maximum recommended craft dimensions for working boats on the West Midlands Waterways are governed by the lock and bridge dimensions and the depth of water. Boat dimensions for particular stretches can be obtained from BW. The design and loading of vessels will be required to meet these specifications particularly on the draught.

2. Speed

The recommended speed for boats on the navigation is 4 miles per hour on canals. Rivers can transport at 8 miles per hour. It should be noted that where there are locks on a particular stretch of canal the journey time can be considerably slower compared to lock free stretches. In the summer season there may be queuing at some of the more popular locks and freight craft may not be given priority over leisure craft. The operator will need to agree the frequency of passage of the boats on the canal stretch with British Waterways to determine the potential conflict with other users. Currently a frequency of more than 4 boats an hour would normally be unacceptable. Where stoppages are planned, depending on the waterway, alternative routes may be available for freight traffic to ensure the continuity of freight operations.

3. Health and Safety

Given the use of the waterways by leisure craft, and anglers and the water quality provided by the waterways, the types of goods and materials transported on the waterways and the methods in which goods and materials are transported will be restricted. As a general rule British Waterways will not permit the transfer of

Hazardous or Special wastes & materials by water. In addition all boats must be designed to exclude the risk of materials entering / falling into the watercourse - so sealed containers are normally required. Boats should be manned by 2 people to negotiate any locks unless the freight is carried on lock free stretches or the health and safety risk is otherwise resolved.

4. Times of Travel

Operators should also be aware that hours of operation will be restricted due to the use of the waterways by leisure craft, residential boaters and the urban and rural locations of the canals. Operators should travel mainly during the 6am to 10pm period and should seek not to disturb residential boaters during hours of repose.

5. Wharfage

The loading and/or unloading of Goods by or on behalf of a Freight Operator onto or over any land owned by or under the control of British Waterways (excluding land let to third parties) is not permitted under these conditions and shall require a separate agreement between British Waterways and the Freight Operator. The transportation of freight by water will require facilities adjacent to the waterway to enable goods and materials to be loaded and offloaded with ease and to prevent pollution of the waterways. Appropriately sited and designed wharves will be required which not only meet the specifications of British Waterways but also the Local Planning Authority.

Key considerations affecting the viability of a wharf site could include:

- Road access
- Piling requirements
- Towpath / amenity issues
- Whether there is space to construct a basin
- Whether vehicles could load / unload at the waterside
- Whether wharves would need to bear mobile cranes and their loads
- Security & safety
- Space for storage of goods

The location of wharves should include the provision of parking for inward and onward travel by road and access roads for workers and local transportation. There should be no disturbance or nuisance caused to adjacent occupiers.

6. Damage to the navigation

The licence terms make the operator liable to repair damage to the canal infrastructure caused by their operations.

7. Dredging

Although the canals were once used predominantly for freight the canal profile has since reduced and a dredging survey should be undertaken to ensure that these boats can actually navigate the system.

8. Water Supply

A full study of the water requirements and current levels be undertaken to determine the impacts from a water control perspective. Many areas may not be currently suitable for freight and a survey of water depth would need to be carried out. Water levels can be adversely affected by flood and drought.

9. Stoppages

A freight operator should be aware that the availability of stretches of waterways

and water levels may not always enable freight movement. British Waterways occasionally needs to drain stretches of water to carry out essential maintenance. These types of stoppages are mainly but not exclusively undertaken in the winter season and notice of 2 weeks or longer are given to boaters and operators. No compensation is payable for such withdrawal of water. If we have a fault, accidental damage or adverse weather conditions and it needs urgent attention we will have to close the canal.

10. License fees
There are commercial charges payable to British Waterways for the use by a commercial operation of the waterway. The fee may depend on the tonnage carried or may be by way of license. The operator will also require insurance and a boat safety certificate. In the first instance contact should be made with BW who will advise as to the current charges and conditions.

11. Particular requirements
British Waterways is receptive to the particular requirements of commercial operators and would seek to identify these requirements and identify how they can be facilitated and funded. Persons in charge of commercial craft will require a Boatmaster's Certificate or a RWA Competence Certificate Where construction will be required near to the bank it will be necessary to comply with the Code of Practice for Works affecting British Waterways for such works which will incur a supervision fee.

12. Show stoppers
Where there are Sites of Special Scientific Interest or European Directives on the protection of the environment freight would not be permitted. The Ashby Canal from Carlton Bridge to the current terminus has been designated as a SSSI for its aquatic plants. The Cannock Extension Canal SSSI/SAC has also been designated for its aquatic plants, mainly the Floating Water-plantain which is also protected by law. These two sites are dependant on navigation as a management tool, Navigation is included in the list of operations likely to damage the site and so any foreseeable or managed changes to navigation would require an assessment of the potential impacts on the canals designation. It would be unlikely that the number of boats increasing on a navigable SSSI would be consented/assented by Natural England. The other canal SSSI's are unlikely to be affected by freight, unless developments occurred within the SSSI boundary.

Further advice please refer to: 1. BW Carriage of Freight Conditions 2. BW Freight Dimensions

**"Any other comments?"**

On page 7 of your document you state "The canal network is extensive and connects to systems to the north, south and east of the county.....As a general rule the capacity for increased freight movement by inland waterway or rail from and or within Worcestershire is not likely to be significant." This has been taken from the Worcestershire Local Transport Plan 2006-2011 which concentrates on the leisure and regenerative effects of the canal network and the projects in the Droitwich canals and in Stourport on Severn. BW would not wish the multifunctional use of the canal network to be compromised by this empahsis. BW would point to the Transport Plans Appendix 2 SEA Environmental Statement Table 3 Item 14 "Manage waste according to waste hierarchy,encourage recycling and use of

renewable resources." which as a conclusion to "Encourage use of canal network, expand regional processing capacity" BW consider that there is significant potential for the transport of waste on the River Severn and that this can only be realised by working with landuse planners and operators at the early stages.