

APPENDIX A3

Comments received on Interim Feasibility Study Report

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1. Keith R Stevens (Nottinghamshire County Council)

Dear Kevin

This letter is in response to the request for the County Council to provide views on the refined route options 3, T1 and 1b/d (together with associated revised costings) as supplied on 19th September 2008. I do apologise for not replying sooner but we wanted to be sure that we took as many views as possible on board, including the views of Members and Officers, before finalising the response.

Firstly, I feel that it is important to stress that there is **no commitment** on the part of the County Council to support any future proposal for the development of a canal link between the existing canal and the River Trent. The following comments are in relation to the relative merits and feasibility of the identified route options *with respect to their potential value in terms of green infrastructure (GI)*.

It is not possible for the County Council to express definitive opinions about any of the options as yet, given the uncertainty surrounding the future development plans at the National Water Sports Centre and the possibility of a major new football stadium and related development in this locality. These two issues could have a fundamental influence upon our views.

The County Council recognises that any of these three options would potentially improve provision of GI within this area. This could be valuable within the context of the evolving 6Cs GI programme as well as in relation to the Trent River Park Partnership's ambitions for the river corridor through Greater Nottingham. Furthermore, any additional GI provision here could add value to the Council's GI assets at Cotgrave and would help to shape our thinking about the future of that locality. Obviously, option 1b/d would be most significant in relation to Cotgrave, because it is the closest. However, a disadvantage of option 1b/d from the County Council's point of view is that it would have the least value in terms of utilising the existing canal through to West Bridgford, which is an important objective.

It appears likely that any future canal link development would only be possible with financial support from developers of new housing in the vicinity. You will be aware that this raises politically sensitive issues and at present the County Council would not wish to be associated with any proposal that appears to lend support to such development.

From discussions between the feasibility study's Steering Group and the consultants, it appears that option 1b/d has emerged as the likely most favoured of the three options, partly because it would appear to be the least expensive. You are already aware of the County Council's concerns about this route in terms of its potential impact on both archaeology and biodiversity – although, in terms of the latter, there might be only a moderate impact and there might well be gains as well as losses.

All three route options raise issues in terms of highways (particularly in terms of constructing crossings over/under the A52 or A6011), but we have not had the opportunity to explore these in detail or to discuss them with the Highways Agency. However, our impression from discussion with the consultants is that route option 1b/d might have less impact in this respect, as compared to the other options.

I trust that you will find these comments helpful.

Yours sincerely

Keith R. Stevens, Service Director Cultural Services, Communities Department

2. Ursilla Spence (Nottinghamshire County Council)

Andy

T1 will have a lot of archaeology - The land to the west of the holme Pierrepont gravel pits was excluded from extraction on archaeological grounds - there are sites in here which we are currently putting forward for scheduling. Could certainly be show stoppers along the proposed route. Definitely not this one.

Option 1. Depends which variations people want to pursue. At the start, 1 is shorter than 1d, but could be a few surprises - virgin ground untouched by damaging development. 1b hits more virgin ground and will be stuffed with archaeology. I would be not in favour of this one. After the Polser brook routes 1 and 1a mainly go through existing gravel workings where there may be bits and pieces left but should not be anything staggering.

My favourite (now 4 is out of the window) would be option 1, or 1 then 1a.

Ursilla Spence, Senior Archaeological Officer, Conservation,
Nottinghamshire County Council

3. Nick Crouch (Nottinghamshire County Council)

Keith and Nic,

In response to Andy's email (below), I have the following comments, which are based on the information contained in the Interim Feasibility Study Report produced by Scott Wilson. I have not had sight of the detailed ecological assessment work that has been carried out.

Option T1: I agree with Scott Wilson that this option seems to prevent the least impact with regards to ecology. It avoids any direct impacts on SINC's (non-statutory wildlife sites of at least county-level importance) and crosses a relatively low number of boundary features (e.g. hedges and ditches). It does pass relatively close to the A52 pit, which is important because of the presence of a Schedule 1 breeding bird (this is one of only two breeding sites for black-necked grebe in the county), but this indirect impact could potentially be mitigated through design, e.g. incorporating vegetation screening into the canal.

Option 1: Options 1 and 1a pass through two SINC's (Gamston Pits and Holme Pierrepont Disused Gravel Pits), and are likely to cause considerable disturbance to breeding and wintering birds and other wildlife/habitats during both construction and operation (although impact on black-necked grebe appear unlikely). I would suggest that there would be considerable opposition (ecologically) for either 1 or 1a. Option 1b avoids any impacts on the SINC's, and is likely to have a reduce impact on breeding and wintering birds, but does cross several boundary features. It would appear that the most significant potential impact is on the Polser Brook (which

supports water voles, a protected species), and I would suggest that the canal run parallel to the brook, rather than subsume it. However, there will inevitably be impacts where the canal has to cross the brook, especially in association with any potential future marina development.

Both options T1 and 1b have the potential to provide green infrastructure, providing an ecological link between the Grantham Canal (a SINC itself) and the Trent/Holme Pierrepoint complex. T1 has the potential to improve connectivity between Adbolton Pond and Adbolton Marsh and these other sites, and to facilitate wetland creation in this area, especially next to the Trent. 1b also has the potential to facilitate wetland creation next to the Trent and the Polser Brook.

In summary, Option T1 appears to be the least damaging ecologically, and therefore would be my favoured route. 1b is likely to impact upon the Polser Brook, but would be my second choice. Options 1 and 1a would appear to cause more significant impacts on two SINCS and other associated interest, and I would not favour either of these options. In terms of GI, both T1 and 1b have the potential to allow habitat creation, and to serve to increase the ecological connectivity of the area. At this time, it is difficult to say which offers the most potential for GI without more detailed information.

I hope that helps, let me know if you need any further information, or if any of the above needs clarifying.

Kind regards,
Nick Crouch

Senior Nature Conservation Officer, Communities, Nottinghamshire County Council

4. Richard Mapletoft and Paul Phillips (Rushcliffe Borough Council)

In terms of route options, I've nothing further to add to what was discussed at the steering meeting after the presentation.

Planning related comments

2.3.1 and elsewhere - there now needs to be mention of and analysis of the Secretary of State's Proposed Changes to the Regional Plan and the fact that Rushcliffe's requirement has been proposed to increase by 19% and the continued emphasis on PUA focussed development.

2.3.4 - it needs to be noted that the timetable for LDF production is due to be amended, which will update the expected dates for LDD production (most of which are behind their originally scheduled production dates). Also, related to this, RBC has agreed to align Core Strategy production with other authorities in the Nottingham Core HMA, and coordinate and jointly progress work in order to take account of and address issues that relate to the whole urban area rather than just individual authority areas.

2.6.6 - it is incorrect to say that the proposed eco-town has been rejected (by Government). It is still being considered by Government as part of the on-going site/sustainability appraisal process.

2.9 - support from developers (financial or otherwise) could conceivably be independent of the S106 process.

2.9 - in respect of the suggested tariff approach, rather than the masterplan being the planning devise for the tariff, would it not instead be clearer to set out that it could assist in the establishment of evidence to inform separate local planning contributions/CIL policy?

Ecology/Biodiversity comments

My main concern about the proposed 1b or 1c route, that is the preferred choice of the steering group, is the possible presence of water voles on Polser Brook, there are historic records, although no current records. There are also records for the remnant canal. The water vole is a European Protected species, I am therefore interested in what mitigation and habitat improvements can be made for water voles with this work, obviously before any work is carried out a full survey for water voles is required along and adjacent to the proposed route.

Regards

Richard Mapletoft, Development Framework Manager, Rushcliffe Borough Council

5. Anna Collins (Natural England)

Dear Kevin

River Trent to Cotgrave Green Infrastructure Study

Trent Link Options

Natural England has an interest in the Grantham Canal, primarily because of the presence of 2 Sites of Special Scientific Interest within the canal itself. We are a member of the steering group to provide some expertise on ecological, landscape, recreation and green infrastructure matters.

In regards to the proposed Trent link our interest is to advise on the ecological impacts of the proposal. As an organisation we have limited engagement and knowledge at the local and district level and as such draw upon the expertise of the Nottinghamshire Wildlife Trust and Nottinghamshire County Council Nature Conservation staff to advise us on the likely local impacts. We therefore support and endorse the comments made by the Nottinghamshire Wildlife Trust regarding there preference for T1 and as a second choice 1b with 1d because these options cause the least harm to ecological receptors. I support the comments made by the Wildlife Trust regarding option 1. We realise there may be archaeological limitations for T1 but these are beyond the remit of Natural England and have not been considered by us.

Natural England would like to take this opportunity to remind all involved that we have concerns about the implications of opening the Grantham Canal as a navigation along its whole length. As you are aware the Canal is important for nature conservation with most of its length designated as either a Site of Importance for Nature Conservation or a Site of Special Scientific Interest. The habitats and species for which the Canal is designated are sensitive to disturbance from boats. Above a threshold level, boats are known to cause damage to the nature conservation value of canals. Natural England, as part of the Grantham Canal Partnership Ecological Sub Group, commissioned an impact study which made clear

that the protection of the nature conservation interest of the canal would have to include the control of boat numbers.

It is important that it is understood that, whilst the work done by Scott Wilson identifies the specific ecological constraints within the study area, it does not consider the wider ecological impact of the link as a concept. At the appropriate time Natural England expect that these wider ecological impacts of a canal link will be considered and expect that mitigation measures to be put in place to ensure that the navigation of the canal will not harm the Nature Conservation interest of the canal. This may include the limiting of boat numbers.

The possible requirement for restriction of boat numbers in the canal must be taken into consideration when considering the possible use (and financial viability) of Marina's and other facilities for boats and boat owners. It would be unfortunate if an unrealistic expectation about the number of boats that could use the canal were established.

Please do not hesitate to contact me if you have any queries concerning this response.

Yours sincerely

Anna Collins, Planning and Biodiversity Adviser, Leicestershire and Rutland Team,
East Midlands

6. Neil Harvey (British Waterways)

Kevin,

We are happy to proceed with the recommended option 1 incorporating variations 1b and 1d. This seems to offer the best solution, balancing engineering, heritage, environment, cost and contribution potential benefits.

Neil Harvey, British Waterways

7. Vaughan Welch (The Inland Waterways Association)

Dear Kevin

River Trent to Cotgrave Infrastructure Study

We refer to Scott Wilson's 28th August letter to John Baylis that enclosed a copy of the interim report to the River Trent to Cotgrave Infrastructure Study and asked for our comments on the contents to be sent direct to you.

Unfortunately we did not receive the letter and enclosure until the following month, which meant that we were unable to respond by the suggested date and, therefore, we apologies for being unable to do so.

With regards to the report itself. We consider it to be well written, although there are a few grammatical errors we didn't pick up any obvious misspellings (except, minor

detail, Hinckley, which is misspelled as Hinkley at least twice (see C1.1.5.2)). The layout and structure of the report is very good.

In respect to the content we comment as follows: -

- Section 2) Planning context is well-presented. Someone with local knowledge should be asked to comment.
- Section 3) Ecology: Also well-presented and well-structured. However, it is desk-work and primarily based on statutory and SINC designations and a brief field survey.
- C1.3.4: table 3.1) A snippet is: -
The banks of the railway may contain **badger setts**;
Option 4b crosses Polser Brook, which is known to support **water vole**.
Additionally a section of Polser brook upstream was found to have habitat potential for **white clawed crayfish**.
Further survey of Polser Brook and adjacent water courses and potential mitigation would be required for these species.
Additionally the route passes adjacent to two pounds, which have the potential to support **great crested newts**, with the railway providing refuge/hibernation opportunities.
The route joins Grantham Canal at a point where there are records of a **water vole**.
The only confirmed presence in the section is (perhaps one) water vole! Overcautious??
- Section 4) Cultural Heritage: Looks very good; but we're no experts (or even amateurs). Is the author having a knock by supplying the derivation of Nottingham (Home of Snot's People) as the only derivation stated in the document? (NB Tony Wilkinson is/was the Sheriff of Nottingham).
- Section 5) Landscape Character: Seemingly much cut-and-paste: but how else to do it?
- Section 6) Recreation: This appears quiet well research and in-depth.
- Section 7) Engineering Comparison of Route Options: There are a very large number of alternative route options. A couple of years ago our Roy Sutton participated in an exercise with Kevin Mann, Caroline Killeavy and Tony Wilkinson whereby it was agreed that the number of options would be reduced (on the basis of an initial walkover survey and engineering considerations only) to just two to be taken forward in detail with other considerations. After a hectic day they concluded that no route could be ruled out on engineering grounds alone. That obviously remains the case.
- Minor, but telling, detail is that p86 refers to 'ground paddles' rather than 'ground culverts'
- The report also states that the original water feeds to the Canal are no longer operational and suggests that a new supply would probably have to be provided by back-pumping to above Lock 7. If that is the case our Tony Harrison would advise that the Partnership should get in touch with the Environment Agency as soon as possible to discuss options.
- C1.7.5) Normally it would be expected that a consultant undertaking this sort of study would undertake some estimation of the quantities and costs involved for each proposed route. However, in this report the costs are all based on a 1995 study by BW, multiplied by a factor

for the indexing of construction costs! There is no handle on current cost of each component of each route. It is quite valid that the BW study is described and equally that it's estimated costs should be quoted. However, these should be compared against costs derived for this study. Not doing this is an abdication of responsibility. Will BW be blamed when the costs turn sour?

- CL.7.5) Not checking the utilities is also quite telling (but at least they honestly admit they have not checked). Crossing a gas transmission main or sewer could cost £1M.
- C1.7.5) Minor detail. '000' is missed from some costs.
- C1.7.7) What units apply to the capacity of the pump? (Should M1w be M1/w?)
- Section 8) Comparison of Route Options: The matrices are so small they are nearly unreadable. Further, they have been so cramped that text in some boxes overlaps other boxes, making both illegible. It would have been better had the matrices been done in portrait, with less route options per page.
- Figures) Figure 1.2 is good but it is totally unintelligible in monochrome. It would have been better to have had three figures on three pages with the same background mapping but with different routes shown by back lines on each page. Figure 1.2 takes ages to load in Adobe. Figure 1.2 (ideally in three monochrome pages) should have been placed at the very start of the document so it is easily locatable for reference.
- Appendix A3-4) Nancy Johnson's reported comments could upset horse-boaters.
- B3-1 Table 2.1 (Funding) is well thought-out (better than masses of waffle sometimes given)
- Other appendices) These are not engineering-related. We have skimmed through them. They appear appropriate and well researched and presented.

In conclusion, we consider that this is a well-undertaken study and report. But engineering forms only a small part of it, and the final decision on short-listing routes will not be taken on engineering grounds. It would seem that engineering effort has been quite deliberately minimised in this work, perhaps that may be justified in that the routes costs are all so similar.

We look forward to receiving a copy of the final report, which we understand is due on the 9th December, for comment before it is published and would ask that, in this instance we are given adequate time to consider it and be able to make a detailed response.

Yours sincerely

Vaughan Welch,
Chairman, Restoration Committee, The Inland Waterways Association

8. Carol Collins (CPRE)

Hi Valerie,

Thanks for giving me a synopsis of what has happened - Frank Thomas was at the August 21st presentation and has given me an idea of what was suggested but I am a bit clearer having read your account! I don't think CPRE will make any further comment at this stage - NWT has the expertise as far as wildlife goes so if you feel that the routes likely to be chosen for further investigation are the least problematic from that point of view then CPRE would go along with that. Our concerns are likely to be related to housing or other development allied to any of the schemes and I think that we will have to look at what emerges in detail and comment appropriately when we get that far.

However, as part of the Environmental Sub-Group, I continue to feel that none of these schemes should be looked at without taking into account the eventual effect on the whole Canal - they must take account of the Ecological Survey which suggests that there would have to be constraints on opening up the Canal for navigation. If, for instance, a big investment were made in a sizeable marina on the assumption that there would be no restriction on numbers of boats going further up the Canal, it would then be very difficult for us to insist on restricting boat movements to the levels that the Study suggests would allow the wildlife to continue to thrive. Should the Sub-Group not be making this point strongly now, so that we don't find ourselves fighting a rearguard action later on? I did email my comments on this after the Cotgrave exhibition (as CPRE) but have had no acknowledgement so I've no idea whether the consultants are now taking our ECUS survey into consideration.

Carol Collins, CPRE

9. Gaynor Jones Jenkins (Nottinghamshire Wildlife Trust)

Dear Mr Mann

Re: Trent Link To Cotgrave Green Infrastructure Study

Thank you for consulting Nottinghamshire Wildlife Trust regarding the green infrastructure study for the preferred route option for the proposed link between the River Trent and the Grantham Canal.

Having studied the Interim Feasibility Study we find that, from an ecological perspective, Option T1 would be our preferred route for the proposed link, as it appears that it would have the least ecological impact on habitats and species of high ecological value. We realise of course that, as stated in the Feasibility Study, this option has not been 'ground-truthed' i.e. ecological surveys have not been carried out on this option to determine the true ecological impact. The feasibility of the route has therefore been judged on desk top study data alone. Ecological surveys will therefore need to be carried out to before a final decision can be made regarding the option's suitability from an ecological perspective, but on the information available to date, it seems to be the best option.

Should Option T1 prove to be unsuitable once all elements for considerations have been evaluated, Option 1b would be our next favoured route. We have selected this option as our second preferred option as it does not impact on any SINC's, however, we have serious concerns regarding this options impact on the Polser Brook and the

protected and LBAP species that have been recorded there, i.e. water vole, otter and potentially white-clawed crayfish. We would therefore encourage you and Scott Wilson, should Option 1b seem favourable to you, to investigate the possibility of creating a new canal alongside the Polser Brook to avoid the impact to protected species negating the requirement for mitigation.

There have been a number of studies recently which speculate about the location, size and feasibility of increasing marina and moorings along the corridor of and in close proximity to the River Trent, and this study is no exception. There are also current and planned proposals to increase the number of moorings along the Trent through river embankment development. This, combined with another study by EDAW that is currently in development, to provide a vision and action plan for the Trent River Corridor from Barton in Fabis to Gunthorpe (Trent River Park), commissioned by Nottingham Development Enterprise (NDE), Nottingham City Council (the Council) and East Midlands Development Agency (EMDA), which also proposes increased river use, moorings and use of the Holme Pierrepont area as a water based recreational facility, has serious implications for the Trent River corridor and the Grantham Canal, should this link to the canal be created. We are concerned that the potential high usage of the river, the Trent Link and ultimately the Grantham Canal, much of which is either SINC or SSSI quality, will have serious implications for the waterbody and its surroundings through increased disturbance to the waterbody and its embankments, ongoing loss of marginal vegetation and water pollution. We therefore request that this study considers the impact of the proposals contained within in it, in relation to the other proposals that are currently under consideration for the River Trent and adjoining waterbodies with regard to recreational water use. We also request that consideration is given to limiting or restricting the amount of boat movements allowed along the Trent Link and the Grantham Canal to ensure that, should a number of the proposals under consideration proceed, the Trent Link and Grantham Canal do not become over used and overcongested.

Please do not hesitate to contact me if you would like to discuss any of the above on 0115 958 8242. I would be grateful if you would keep me informed regarding the progress of the study.

Yours sincerely

Gaynor Jones Jenkins BSc (Hons) AIEEM, South & West Notts Conservation Officer
Conservation Policy & Planning Dept.