



Wilts & Berks Canal Trust

Response to Chippenham Avon Project Consultation

**Protecting and Supporting the Restoration of the Wilts & Berks Canal in
Wiltshire**

May 2024

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Summary

The Wilts & Berks Canal Trust is responding to two current consultations, both running from 16th April to 28th May 2024:

1. The Chippenham Avon Project sponsored by the EA, Wiltshire Council and Chippenham Town Council <http://www.chippenhamavonproject.com/>
2. The Chippenham Avon Project Masterplan sponsored by Wiltshire Council and the Chippenham Town Council Partnership Board <https://www.wiltshire.gov.uk/chippenhamavonproject>

The interests of the Trust in the consultation are twofold: the continuation of use of the river by leisure craft as exemplified by the Trust's trip boat which has operated during the Chippenham River Festivals and Chippenha Food Festivals; and a connection to the river for the planned restoration of the Chippenham Branch of the canal.

This document is the Trust's response to the Chippenham Avon Project proposals to fundamentally change the river appearance and environment. A summary of this response is also made via the online form. An appendix contains the brief responses to the second consultation where relevant to the interests of the Trust.

The Trust is against the basic proposal to remove the gate structure and lower water levels. This will drastically alter the historic appearance of the river in the town centre and make navigation by other than very small craft impossible.

The result will be that the Trust will have to abandon its plan to improve leisure use of the river with boats on the water and will have to reconsider the scheme for the restoration of the Chippenham Branch Canal. It is well-proven that access to waterside space offers considerable benefits and use of the water by craft enhances this effect. Water and boats are a major attraction to many town centres bringing economic benefits also. These opportunities will be foregone if the water level is lowered.

The EA has not shown analysis to demonstrate the claimed benefit to flood reduction nor evaluation of the costs and benefits of alternative schemes to the preferred one.

1. Introduction

The Wilts & Berks Canal Trust is responding to two current consultations, both running from 16th April to 28th May 2024:

- The Chippenham Avon Project sponsored by the EA, Wiltshire Council and Chippenham Town Council <http://www.chippenhamavonproject.com/>
- The Chippenham Avon Project Masterplan sponsored by Wiltshire Council and the Chippenham Town Council Patnership Board <https://www.wiltshire.gov.uk/chippenhamavonproject>

The consultations are linked by the proposed changes to the River Avon through the town. The questionnaires on the proposals for the river available on the Wiltshire Council site and the Environment Agency site are identical. The online questionnaires provide limited scope for comment and therefore this document which provides a fuller statement of the Trust's position is submitted directly to the Wiltshire Council consultation portal. The sections following after the background explanation of the Trust's interests reflect the arrangement of the Chippenham Avon Project questions and include the brief responses in the questionnaire with a fuller explanation of the views of the Trust. A brief response to the consultation on the Chippenham Avon Project Masterplan is also being made where relevant to the proposed changes to the river and is copied into the Appendix 1.

The primary interests of the Trust are twofold: the continuation of use of the river by leisure craft as exemplified by the Trust's trip boat which has operated during the Chippenham River Festival; and a connection to the river for the planned restoration of the Chippenham Branch of the canal. In general, the Trust supports the improvement of wildlife habitat and access to the river by the public.

2. Using the River at Chippenham

There was a weir across the river near Town Bridge for over 250 years which enabled operation of the mill. The heritage value of a weir and its associated history has not been considered. In recent decades the gate and weir have continued to raise the water depth upstream to support industry which has now gone. Water level higher than the natural level should be considered as the heritage of the town and enable use of various craft for leisure. The Chippenham River Festival and Chippenham Folk Festival have featured very popular boat trips organised by the Trust. Such trips provide enjoyment of the river environment and encourage support for maintenance and restoration of canals and navigable rivers.

The Trust operates short leisure trips with permanently moored boats at Swindon and Royal Wootton Bassett and occasional trips near Pewsham. These are highly successful in encouraging support for the restoration programme. The Trust has plans for a permanent base on the river at Chippenham with a mooring and regular boat trips which will have to be abandoned if the barrier is completely removed. This plan is in advance of building the Chippenham Branch of the canal.

3. Restoration of the Wilts & Berks Canal and its Branches

The restoration of the Wilts & Berks Canal throughout Wiltshire, Swindon and Vale of White Horse in Oxfordshire is recognised and protected in the current local plans of all three authorities. In Wiltshire the route for the restoration of the Wilts & Berks Canal with its North Wilts, Chippenham and Calne Branches, including essential diversions from the original route, is protected from adverse development under Core Policy 53: Wiltshire’s Canals in the Wiltshire Core Strategy of 2015. Further protection and support for the restoration is proposed in the new draft local plan on account of the contribution to the Green and Blue Corridor Strategy and the widespread identified benefits to the community, to business and to the environment. The restoration project in relation to connecting waterways is shown in the map at Figure 1.

The restoration is a long-term project which has evolved over many years and will need to continue to adjust as the world around it changes. It is essential to the completion of the project and the maximisation of its potential benefits to the community that the route is adequately protected for the long term and restoration supported.

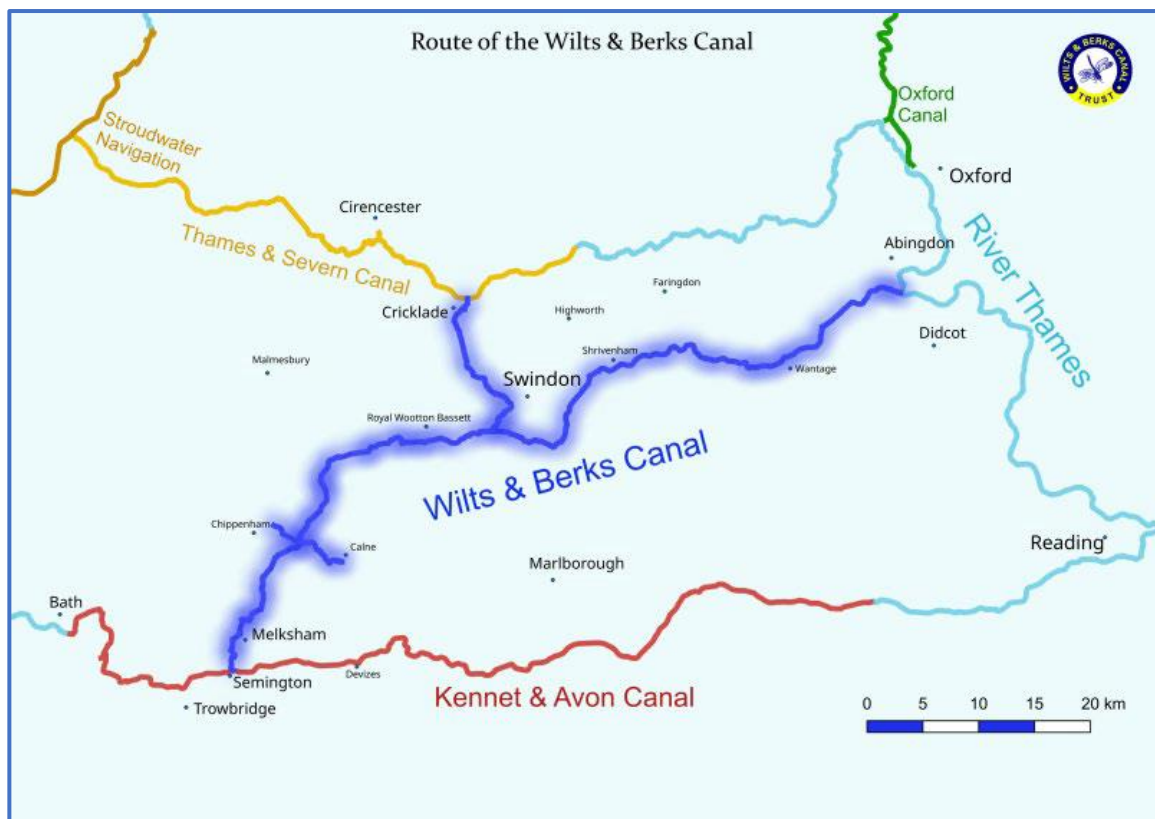


Figure 1 The Southern Waterways Network

The original Chippenham Branch canal is now largely built over at the western end and has been abandoned for restoration purposes. It originally terminated at a wharf off Lord’s Lane (now the bus station) and did not connect to the river. A short section of this branch connected to the main line, including the area where clay pits and brickworks for building the canal structures are found, is still potentially accessible. This section could be restored if access and funding were available.

A new branch route between the canal at Stanley and the River Avon north of the built-up area has been identified, see Figure 2. This mainly follows closely the former railway line, now a cycleway, from Stanley on the main line of the canal to the River Avon north of the developed area of the town. This is the route shown on the Trust's maps and on the Wiltshire Local Plan policies map of 2015 and the recent draft local plan proposals. It is designed to enable canal craft except the very longest to lock down into the River Avon and travel as far as the town centre.

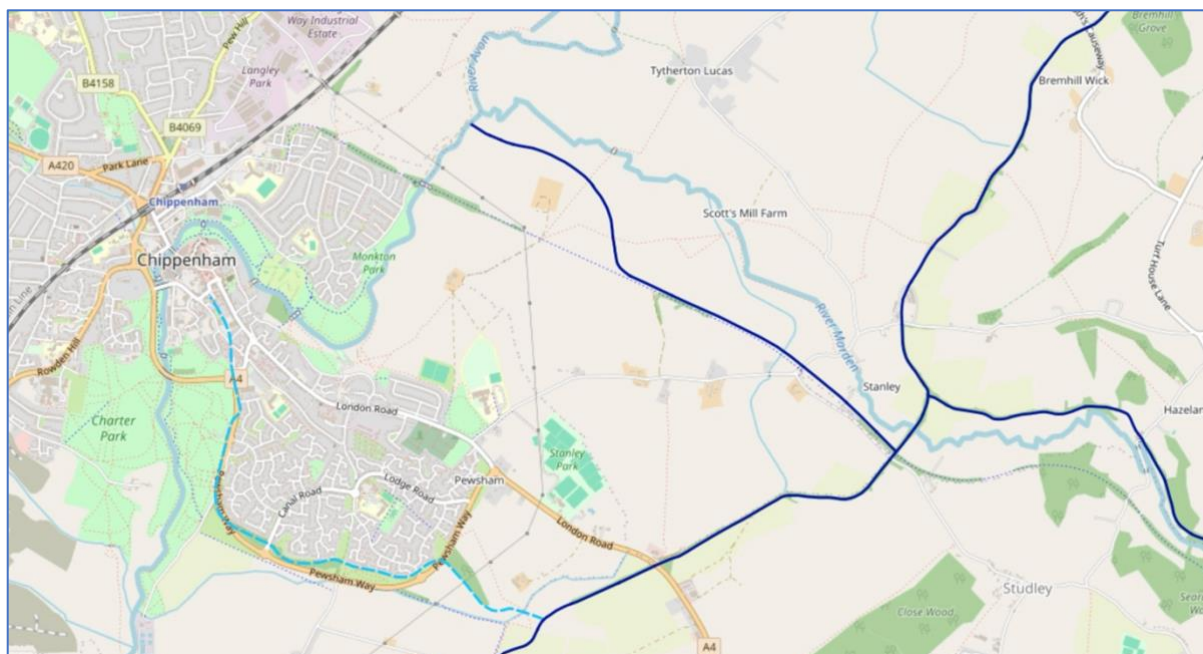


Figure 2 The Chippenham Branch Canal Route

4. Responses to the Chippenham Avon Project Consultation

4.1. Q5. How much do you support the general concept being proposed?

Answer 1 – Against the proposal

The heart of the proposal is the removal of the gate and naturalisation of the river with installation of rock weirs which will lower the water level above the gate position. This will drastically alter the historic appearance of the river in the town centre and make navigation by other than very small craft impossible.

The result will be that the Trust will have to abandon its plan to improve leisure use of the river with boats on the water and will have to reconsider the scheme for the restoration of the Chippenham Branch Canal. It is well-proven that access to waterside space offers considerable benefits (see section 5 below) and use of the water by craft enhances this effect. Water and boats are a major attraction to many town centres bringing economic benefits also. These opportunities will be foregone if the water level is lowered.

The EA has not shown analysis to demonstrate the claimed benefit to flood reduction nor evaluation of the costs and benefits of alternative schemes.

The sketches of water level under 'normal' moderate flow conditions are inadequate to demonstrate the effects of the changes, the predicted high and low levels should be shown for each reach.

The consultation in 2023 offered three options:

- **Replacement of the existing radial gate structure:** maintaining the amenity water level, but not providing wider benefits, e.g., recreational and ecological.
- **Removal of the existing structure and re-naturalising the channel upstream:** resulting in the loss of amenity water level currently provided but providing maximum ecological benefit.
- **Removal of the existing structure and replacing it with a series of low rock weirs through the River Avon in Chippenham:** maintaining a slightly higher water level than the re-naturalising option, but with more ecological benefit than replacing the structure.

The first option gives clear alternatives - replace the structure OR wider amenity and ecological benefit – but does not explain why they are incompatible. There is no evidence that improvements while retaining the water level have been investigated. Still 45% of respondents preferred to retain water levels through the town but this option has been dismissed, apparently due to assessment of cost and risks after the post-consultation failure of the old gate. The report on the consultation says:

The results of the consultation showed no clear preference between the options, with 45% preferring the replacement of the structure, 32% to remove and re-naturalise, and 23% to remove the structure and replace with smaller weirs. Analysis of the free text questions indicated that although replacement of the gate received the highest vote, this was principally in support of a maintained higher water level, and not a direct support of a new structure. The main theme to come out of this consultation response was the desire to maximise environmental benefits whilst also maintaining or enhancing the current amenity provision. The desire to remove the gate came out strongly in a lot of responses, and it is felt that if the options had just been replacing the gate with something similar, or removing it, the majority would have voted for its removal. It should also be noted that many responses were also received after the consultation, with the majority of these in favour of the removal and re-naturalise option.

The preferred option of adding rock weirs is actually the lowest preference in the consultation results. The questions can be interpreted as biased towards a preferred solution. The last sentence suggests an organised campaign in favour of improved ecology which has weighted the results.

There appears to be some funding allocated by the EA for capital works linked to removal of the gate. It is not clear that the funding for long term maintenance will be available particularly in view of the extensive proposals for footpaths, boardwalks, bridges and rock weirs which may be at risk in flood conditions. Will these cost fall upon the riparian owners and have they agreed? If these features are not provided and maintained the scheme will be a failure.

4.2. Q6 & Q7. How satisfied are you with the proposed works for Reach 1?

Answer 4 – **Moderately satisfied**

Reach 1 is below the area that potentially could be navigable and therefore not of direct interest to the Trust. However the Trust is supportive of all efforts to improve the quality of green and blue space and therefore supports the work in principle. The EA should confirm if removal of the barrier makes this section more liable to flooding.

4.3. Q8 & Q9. How satisfied are you with the proposed works for Reach 2?

Answer 1- **Extremely dissatisfied**

All the reasons given in Q5 apply. The water level should not be drastically lowered below the historic levels and passage of craft not restricted by low bridges.

Removing the existing weir reduces the water level at reach 2 and above. This would have a detrimental effect on the river channel, the habitats along the river and the look of the river around the bridge. During summer months, with a significantly reduced water flow, the current channel will look like a dried up river bed around the town bridge. Reducing the channel width as suggested would be extremely expensive and in the winter months would create a flood risk. The cost of doing this work on the banks would be better used improving the current weir. There are modern alternatives to the radial gate, which are less liable to becoming blocked as happened in 2023. These do not appear to have been explored or costed, although the EA is about to install such an alternative on the Thames at Benson in Oxfordshire.

4.4. Q10 & Q11. How satisfied are you with the proposed works for Reach 3?

Answer 1 – **Extremely dissatisfied**

All the reasons given against Q1 apply. The water level should not be drastically lowered below the historic levels and passage of craft not restricted by low bridges.

The reduction in water level in reach 3 and the addition of rock cascades would mean that boats will never be able to use this stretch of water. There is an economic benefit to the use of rivers in towns for boating and leisure, as demonstrated at the annual Chippenham Folk Festival. We understand that in Melksham, where the Wilts and Berks restoration proposals are at an advanced stage, this benefit could be as large as £10m per year; furthermore, these proposals include a hydro scheme at the weir to generate electricity.

The changes to the gate and weir would also appear to rule out the option of installing a hydropower scheme there. A study by North Wilts District Council in 2009 found that such a scheme could be sound technically but the economic evaluation clearly would have to be updated. The EA was not dismissive of the scheme. A similar hydro scheme is under development on the River Avon at Melksham.

4.5.Q12 & Q13. How satisfied are you with the proposed works for Reaches 4 & 5?

Answer 2 - **Dissatisfied**

Aside from the matter of lowering the water level the Trust supports improvements to the ecology and public access. The consultation document does not explain why improvements cannot be made while retaining a higher water level.

The reduction in water levels illustrated in reaches 4 and 5 are for 'normal moderate flow' conditions. In the summer months, the reduction of river level of over 1m plus the exposed cascade features will mean that no boats of any kind would be able to use the river. Our proposed route, protected in the Wiltshire Council Local Plan, connects into or just upstream of reach 5.

4.6. Q14. Should the riverside works in the town centre reflect the urban nature?

The town centre reach has had a developed or urban character for centuries albeit it is in need of improvement. From the perspective of boat users on the river it would seem natural to move from a rural setting to urban setting. There appears to be considerable scope for redevelopment and improvement to enhance the area's attractiveness and therefore the Trust supports maintaining the urban character.

4.7. Q15. Are there parts of the concept that should be changed?

The concept is fundamentally unsatisfactory because of the lowered water levels. As described in responses to earlier questions, a structure to keep water levels near to their historic levels should be retained along with other works to improve flood protection, ecology and access for the public. Community benefit would gain considerably from the use of boats on the river and the draw to the public they would create. This would also enhance the potential gain from connecting the canal to the river.

The reduction in river height is one option but only a one-sided version has been proposed. There are no financial estimates showing the option of keeping the weir in some form versus its removal. This is public money, so the EA has a duty to show the cost of the various options. Improving river side access, paths and natural habitats in reaches 1, 4 and 5 can be done irrespective of the proposed water level reduction.

Removal of the weir as a stand-alone project has not been justified, either in biodiversity, flood risk, heritage, amenity or economic terms.

4.8. Q16. Are there additional elements that should be added?

The Trust is proposing to establish a simple operation of public boat trips on the river if a higher water level is retained. This would operate from a small wharf and slipway instead of the temporary landing point used previously.

4.9. Q17, Are there elements that should not be included?

The Trust is not convinced of the suitability of rock weirs which may become unstable in time and will present a hazard to all craft.

5. Benefits of waterways and canal restoration

There is a substantial body of work that confirms the considerable benefits of people having access to waterways and restored canals. Recent research by the Trust based on national data and local data such as that from the re-opening of the Kennet and Avon Canal has identified the huge value of the complete restored canal to the community in economic, habitat and human health & welfare terms:

- £54 million pa GVA from increased economic activity
- £138.6m pa savings due to increased exercise, improved health and wellbeing, and NHS savings
- £45.5 million remuneration for the construction workforce
- 1,896 habitats of principal importance across 750 acres
- 190 community activities each year and growing
- 200 year heritage worthy of best-in-class protection

These are the reasons why the restoration is supported and welcomed by so many organisations and members of the public. Chippenham could derive a larger share of the benefits if the canal were to be constructed and craft able to access the river.

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APPENDICES

Appendix 1 Response to the Consultation on Chippenham Avon Project Masterplan

This consultation is wider than just the immediate changes to the river. The Trust confines its responses to those questions related to the river while acknowledging that the masterplan cannot separate out entirely the constituent parts. Responses are given here to the questions 1 to 5.

Q1. Overall do you support the proposals?

No response to this broad question since the Trust disagrees with certain of the proposals.

Q2. & Q3. To what extent do you agree or disagree with the General Development Principles?

The Trusts' own aims and development plans as a responsible organisation dedicated to providing and maintaining green and blue corridors for the community accord well with many of the general development principles and can be supported but the Trust does not agree with all the actions described in the eight principles. The Trust remains neutral on those less relevant to the Trust's interests.

The Trust **strongly disagrees with the CAP2 proposal** because it requires removal of the gate structure and consequent lowering of the water level upstream. The result will be that the Trust will have to abandon its plan to improve leisure use of the river with boats on the water and will have to reconsider the scheme for the restoration of the Chippenham Branch Canal. It is well-proven that access to water and waterside space offers considerable benefits and use of the water by craft enhances this effect. Water and boats are a major attraction to many town centres bringing economic benefits also. These opportunities will be foregone if the water level is lowered.

Please refer to the Trust's response to the parallel Chippenham Avon Project consultation for more detail.

CAP 1: Biodiversity - Agree

CAP2: River improvements – Strongly Disagree

CAP3: Flood risk and Water Management - Neutral

CAP4: Integrated Development - Neutral

CAP5: Access - Agree

CAP6: Public Realm - Neutral

CAP7: Public Protection and Amenity - Neutral

CAP8: Management and Maintenance - Neutral

Q4 & Q5. To what extent do you agree or disagree with the Proposals for Each Reach?

The proposals are related to improvements to the environment of and around the river in general terms and do not necessarily depend upon specific changes to the river. The description of proposed improvements to Reach 2 appears to leave open the option of retaining or removing a structure despite the explicit removal of the structures under CAP2 of the general development principles. Otherwise, the proposals offer a good development guideline irrespective of the water level.

Reach 1: - Neutral

Reach 2: Strongly disagree on the basis that water levels will be lowered

Reach 3: Agree

Reaches 4 & 5: Agree