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To the Planning Strategy Team

Please see below our consultation response to the Canals Strategy for the Stroud District.

This is in two parts. The first part (A) contains our carefully considered view. The second part (B) attempts to answer the specific questions put forward by the District Council in the 'Please read this first' document.

Part A is also the basis for an 'Open Letter' which we have sent to various interested parties.

Sincerely

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BSc. Further details of addresses available on request.

(A) Our view

Is the Strategy fit for purpose?

It was with interest that we read the newspaper article *Council casting off to find future vision for canals* in Stroud News & Journal (Feb 23). The piece appealed for the public to respond to the Draft Strategy for the Stroud Canals. The article claims that the Strategy *'suggested community uses and activities, ideas for improving travel and movement along the canals, projects for wildlife enhancement and for people to connect with nature'*.

Therefore we were keen to see how Stroud District Council's Draft Strategy approaches a vision for the canal and adjacent river corridor and identifies opportunities to further the conservation and enhancement of its wildlife and habitats.

The Strategy is available online for download, and consists of two main documents, A and B, plus four supporting documents including summaries of initial stakeholder and public consultations and a Pilot Study of the Strategy in the Wallbridge Area. There is also a 5 minute video.

The documents presented are intended to allow the general public to comment, and in particular to answer some questions posted by the Council. The first downloaded document (A) is a Wall Chart for printing at A1 size; the second one (B) is a series of charts and tables that need to be printed at A3 size. Unfortunately we don't have the resources for this (and we presume this is the same for most people) so we tried to view them on a laptop. The smallest words (and there are a lot of them) in the charts of B are about 1mm tall, and if one tries to zoom in, the letters were blurred. In order to see the 'whole' it is necessary to take a lot of screen shots of areas of the canal corridor of interest and then to create a separate document.

If, as an interested member of the public, one manages to get past this stage, then begins the task of understanding how the strategy is framed. Unfortunately, this is like trying to learn a complicated board game with the rules inadequately explained – the introductory ‘Please read this’ statement by SDC does nothing to help play the game. In fact, in order to fully understand it, you must be well versed in the ‘Placemaking Methodology’, preferably with training in planning and landscape design. If you are really keen, you can download an online document produced by RIBA to help decipher the thinking behind the framework. Given this, it is fair to say that the strategy, as presented online, is impenetrable to the layperson. Most people are likely to give up after opening document A. It is even probable that prospective developers and other stakeholders will struggle to understand documents A and B. In consequence, whilst we are environmental professionals, we have spent many hours trying to make sense of the charts, tables and diagrams.

The over-riding purpose of the charts and tables within Documents A and B is to slide them seamlessly as Supplementary Guidance into SDC Local Plan Delivery Policy on canal restoration ES11, ‘Maintaining, restoring and regenerating the District’s Canals’.

The consequence of all this is that we are afraid that the response to this consultation by the general public will be poor. They will either give up, or just base their comments on the Video that Stroud District Council has produced. We believe these documents are inadequate for a public consultation.

The Public Consultation that forms part of the Evidence for the Draft Strategy

We would be interested to know how much effort went into engaging the stakeholders and the public in collecting opinions summarised in the Evidence documents. A response from only three persons in the public consultation for the Eastern Upper Valley cannot be said to be a representative sample. Similarly it appears that only three Parish Councils responded to the stakeholder consultation. Why is this, and why is there no documentation of the methodology used for the consultations?

Where is the Vision?

In the preamble at the beginning of the link online, SDC frame their Draft Strategy as a ‘*long term vision and strategy*’, and the Council clarifies its purpose as ‘*specific initiatives to be delivered in the short, medium and long term, to improve the canal network*’. Great, but where is SDC’s Vision to accompany these specific initiatives? In our view a vision should indicate high level aspirations for the future, and we don’t find them. A clear vision should be the foundation for setting effective and logical initiatives. Or perhaps here we are expected to make do with the accompanying video?

Purpose

Particularly in the rural areas, to whom are the above stated ‘specific initiatives’ aimed? Supported by Local Plan, Delivery Policy ES11, there is an underlying assumption behind the Draft Canals Strategy that the canal is restored to a navigable state over the entire canals system. In their publicity, the Cotswolds Canals Trust indicates that Areas 9 (from Brimscombe Port) and 10 (to Sapperton) are within their planned Phase 3 restoration plans for the Thames & Severn Canal. But who is the navigable restoration of the canal for? Is it for the use of just four boats / hour (the predicted maximum use for this narrow canal stretch)? Or is it for the many walkers who want a pleasant walk in nature but who don’t need a navigable canal to already make good use of the area for recreation? Do the costs make sense here, particularly in relation to benefits to the local community? Giving this as an example, we think that the public should be informed about the assumptions behind the strategic proposals regarding the *entire* canal corridor.

Our Vision

Our vision is for a water network teeming with wildlife, enjoyed by local people for their wellbeing and celebrated by them for the wonders of nature itself. Through careful land use decisions, aiming to Connect, Create and Celebrate, biodiversity will have increased, thus reversing the local and national decline of habitats and species. In the lower canal and river corridor of the Vale, habitat restoration will have created extensive reedbeds and wet grassland where bittern, spoonbill, cattle egret and glossy ibis breed. Sandbanks are occupied by sand martins. These will connect to wider wet grassland areas that support curlew and corncrake. From Brimscombe through Stroud to Saul Junction, it will be commonplace to glimpse the azure streak of a kingfisher, or to see the ripples left by a water vole. The easternmost sections of the corridor beyond Brimscombe Port to Sapperton will consist of riparian and wetland habitat that would support a healthy population of otters, as well as Bechstein's and Alcaethoe bats. Beyond Chalford, a successful Nature Recovery programme will continue to link the valley wetlands along the tract of the old canal with an extensive mosaic of woodland, wood pasture and limestone grassland, extending up the valley to the source of the Frome.

The preservation of the natural environment and the impacts of development

We believe the Draft Strategy drastically under-estimates the *existing* biodiversity value and importance of the canal and river corridor (including some brownfield sites), particularly between Brimscombe Port and Sapperton (Areas 8-10). This is also evident in the apparent inconsistency between the aims of Delivery Policy ES11 (canals) and the Policy 'Providing for biodiversity and geodiversity' ES6 states :

'The Council will support development that enhances existing sites and features of nature conservation value (including wildlife corridors and geological exposures) that contribute to the priorities established through the Local Nature Partnership. Consideration of the ecological networks in the District that may be affected by development should take account of the Gloucestershire Nature Map, river systems and any locally agreed Nature Improvement Areas, which represent priority places for the conservation and enhancement of the natural environment. In this respect, all developments should also enable and not reduce species' ability to move through the environment in response to predicted climate change, and to prevent isolation of significant populations of species''

The Draft Canals Strategy, itself underpinned by SDC's current policy ES11 which supports the restoration of a navigable canal tract (the impact of which can be considered as 'development') fails to make reference to the biodiversity principles inherent in ES6 or the Nature Recovery network (see next). This is against the inevitable destructive impacts of such work on the environment. Canal restoration will require site compounds and a haul road running parallel to the canal and taking up the towpath. To make way for this, most towpath and riparian (canal and riverside) vegetation will need to be removed, including mature trees and woodland on at least one side and probably both sides of the towpath. The canal and river corridor will resemble a road building project and take many years to complete. If SDC is serious about this stretch of the canal being included in this Strategy then the in preparation for these works a full Environmental Impact Assessment should be undertaken immediately. None of this is referred to in this Strategy.

In the PFD for Chalford, reference is made to harnessing the canal in Area 10 for 'water management in collaboration with all stakeholders.... for the benefit of the wider region'. We think this may be with reference to the oft talked about potential for water transfer between the Severn and the Thames rivers. For geological and ecological reasons (as well as cost) this idea has been considered and rejected in the past. However, a report written in July 2021 on behalf of three water companies entitled 'River Severn to River Thames Transfer (STT) Strategic regional water resource solution Environmental Assessment Report: Biodiversity Net Gain and Carbon' suggests otherwise. The Strategy should provide direct reference to this potential as a possible driver for the restoration of Area 10, and again it points to the urgent need for a full Environmental Impact Assessment.

Nature Recovery Network

Stroud District is an area that is fortunate to be endowed with an intricate network of high value nature sites found the length of the Cotswold canals and their associated rivers. We believe this is a case for celebration around which future planning should orientate; an opportunity rather than a constraint, as is often mentioned in the Draft Canals Strategy. The Evidence base accompanying the Strategy consists solely of summaries of consultations (see ‘*Evidencing the Strategy*’ and ‘*Summary of Public Online Consultation*’). The Strategy makes no reference to the Gloucestershire Nature Recovery Network (a project of the Local Nature Partnership that is mentioned in Policy ES6), nor does it attempt to integrate any other existing landscape, geological or ecological reports on the Frome catchment. It does not evaluate the natural capital provided, nor does it show how the existing natural resource along the canal might contribute to the absorption of greenhouse gases.

The Gloucestershire Nature Recovery Network provides a significant ecological evidence base in a number of interactive online maps (see [GLNP | Natural Capital \(gcerdata.com\)](https://www.glnp.org.uk/natural-capital/)). This mapping project, continually updated, uses algorithms to locate opportunities for creating a more resilient network of habitats for people and nature. Maps identify existing hot spots of habitat (core habitat), and also show where networks, both for biodiversity and ecosystem services, can be optimally located. For the Upper Eastern Area of the Draft Canals Strategy, existing core habitat covers most of the valley catchment, including the canal and the Frome. Nature recovery can occur by linking this core habitat with adjacent areas that have a high potential for restoration.

Given the commitment of the Stroud District Council to the Nature Recovery Network, and the high value nature along the corridor, it is unacceptable that Biodiversity Opportunities are not identified alongside the Carbon Reduction Opportunities and Social Outcome Opportunities within the Placemaking Framework Diagrams in Document B.

What we propose

- For the reasons stated earlier, we believe that this Strategy, as it stands, should be rejected. It should be re-imagined, and re-written in plain English using a different methodology and with a different set of Drivers. Following on, the Draft must be re-designed to include the natural environment as one of the Key Drivers (it is not acceptable in the Draft to have Biodiversity and Green infrastructure as a mere ‘Ingredient’ in a smorgasbord of options). We do not rule out looking at legal action under appropriate legislation if the main body of our concerns is not met.
- The Evidence base should include background information in support of the key ‘functional’ Drivers. This should include (a) the socio-economic basis for development of the canal, (b) an inventory and assessment of the ecological, geological or landscape resource, (c) background information / update on the oft-proposed regional water transfer scheme through the Thames & Severn Canal, (d) reference to the importance of the Heritage Strategy for Stroud District, and (e) evidence from landscape character assessments.
- A separate, written Vision statement is required. For example, covering the rich ecological resource of the area, biodiversity must be a significant part of this. We want a vision to include the Protection, Connection and Celebration of all high value nature sites. And in other areas we this vision should be to reverse the trend of the local and national decline of habitats and species .
- Supported by Delivery Policy ES11, there is an underlying assumption behind the Draft Canals Strategy that the canal is restored to a navigable state over the entire canals system. We fundamentally disagree with this premise in the high nature areas between Chalford and Sapperton (Areas 9-10). If this Strategy is to be approved, we strongly believe it must exclude these environmentally sensitive areas, and a new Strategy for the area re-imagined.
- However, if the canal is to be restored in the enclosed valley of Area 10, with its core areas of high nature value woodland, grassland and wetland, major ecological and landscape impacts can be anticipated (over several years). This would include, new haulage roads and plant depots. It would disrupt habitat connectivity in the valley for many years with very significant wildlife and carbon costs. We believe that if the Draft Strategy is adopted in its entirety, then it must be shown at this

stage that the benefits of these impacts outweigh the environmental costs. In addition, any Draft Strategy must include, in its Evidence base, appropriate studies (e.g. feasibility, ecological) plus Environmental Impact Assessment/s for the areas of the canal/s proposed for restoration.

- Again, if indeed the Draft Strategy is adopted and included in Delivery Policy ES11 as Supplementary Planning Advice, then it is essential that supplementary guidance on Biodiversity is also prepared for inclusion. This will also complement the ‘Heritage Strategy for Stroud District’ that has been adopted as supplementary guidance to Delivery Policy ES10 (‘Valuing our historic assets’).
- Between Brimscombe and Sapperton, we support any proposed opportunities and activities that provide or improve access for people of different abilities on foot, cycle or wheelchair. We support activities that protect, manage and celebrate nature, with signage and interpretation where needed. And while the canal should not be made navigable here, we believe that parts of the canal (e.g. locks and associated structures) can still be managed, where required, for public safety and to preserve the unique industrial heritage.

A lost opportunity?

- In the Stroud District, we live in a beautiful environment which is still able to support a range of species and habitats that have been lost elsewhere. Yet, even here, wildlife is declining. We believe that Stroud District Council needs to show its commitment to our natural heritage by more openly supporting the government’s 25 Year Environment Plan’s strategy for a Nature Recovery Network. Unfortunately, the Canals Strategy, as proposed, does not do this. This is particularly evident for the eastern canal Areas 9 and 10.
- By fully considering the opportunities in continuing to develop the core Nature Recovery Network of the ‘Golden Valley’, Stroud District Council could truly celebrate the government’s mission ‘to halt overall biodiversity loss, support healthy, well-functioning ecosystems and establish coherent ecological networks.’ This would provide ‘... more and better places for nature for the benefit of wildlife and people’. (‘Biodiversity 2020: A strategy for England’s wildlife and ecosystem services’).

B) Specific questions asked by SDC within the document under ‘What would we particularly like your views on?’

1: Are these the right Drivers for Change? Have we missed anything you would like to add?

The three drivers are Continuity, Clustering and Crossings. As mentioned above, these drivers have been created by landscape architects as a basis for urban design in a process called ‘Placemaking Methodology’. We believe such an approach is inappropriate in a rural or semi-rural setting. Additionally there is no supporting evidence document written in plain English outlining how the ‘Drivers’ and their ‘Ingredients’ have been allocated. We do not think this Methodology is appropriate for this rural/ semi-rural area but if it is, then Biodiversity should be included as an ‘Opportunity’.

Upper Eastern Valley, Area 10. The key driver for the Placemaking Framework Diagram for Eastern Upper Valley (EUV) area is Continuity. The other two Drivers are almost absent. The Strategy postulates that ‘innovative and collaborative initiatives are required to safeguard the ecological aspects of the valley as a whole, and to harness the canal as a conduit for ecological enhancement and water management in collaboration with stakeholders. This might be achieved through horticultural, engineering or green infrastructure intervention in this area for the benefit of the wider region’. Mention of engineering appears to support the restoration of the canal in this area. This would devastate a corridor that has effectively rewilded itself since the canal fell into disuse about 90 years ago. We regard the comment about green infrastructure intervention is superfluous if this comment is confined to the canal and river corridor because, as demonstrated by the Gloucestershire Nature Recovery Network, this is *already* an area of undisputed

high nature value with core habitat providing high ecological permeability. There are excellent opportunities for species to migrate between the existing riparian corridor and adjacent ancient woodland, wetland and floodplain, wood pasture and calcareous grassland.

The EUV Framework acknowledges that the unique ecological and heritage qualities of the upper valleys area selling points for the tourism experience due to the landscape and acknowledges the influence of the upper Frome catchment (arising at Miserden) for telling the canal's story, and if *'this can be harnessed correctly and sensitively the area could inherit regional acclaim, akin to being an eastern partner to the WWT Slimbridge landscape in the west'*. Is this, then, possibly a vision for nature management, protection and rewilding? This would need clarifying as it appears to contradict the statement about harnessing the canal as a conduit for ecological enhancement and water management that might 'be achieved through horticultural, engineering or green infrastructure intervention'. Further detail is required as to initiatives and intentions posited.

Finally for the Eastern Upper Valley there appears to be a presumption that pedestrian access along the canal is difficult – *'implementing walking and green infrastructure in ways that is appropriate for the ecological and river catchment context can offer a series of opportunities to provide not only educational outcomes but ecologically beneficial results for all residents within the River Frome catchment'*. The towpath is already fully accessible and in active use by a large proportion of local residents and those living further away. If the framework is encouraging the area to become a honeypot, and attract visitors from afar, then for such a sensitive area, surely baseline information needs to be collected, and the resilience of the local ecology assessed?

2: Do you agree with the number and boundaries of the 14 canal strategy areas? Do the areas and their profiles reflect your understanding of the different character and functions of places?

We have concentrated our efforts on the eastern end of the Thames & Severn Canal, from Area 8 to 10, and so we cannot comment on the other areas. It has been extremely difficult to ascertain the location of the beginning and ends of each canal corridor, except for Sapperton Tunnel; we have done our best to ground truth using other maps showing roads and other features.

Therefore we can say for practical purposes we agree more or less with the Areas set out.

3: Do you agree with the key ways identified on the diagram and in the text in which each canal strategy area could be improved? Do you agree with the carbon reduction opportunities identified?

Please note our comments about the Methodology used, which we don't regard as appropriate for this study. In addition, it would have been helpful if the Placemaking Framework Diagram (PFD) included the place-marking of familiar names such as Chalford High Street, the Lavendar Café or the A419.

The Council claims that the Strategy provides *'suggested community uses and activities, ideas for improving travel and movement along the canals, projects for wildlife enhancement and for people to connect with nature'*. These suggestions are disappointing and at best propose vague activities such as *'strategically placed hubs that are a focus of wildlife conservation and education programmes'*. This is not new – whilst we are unsure what a 'hub' means (access points?) wildlife organisations such as the Stroud Valleys Project and Gloucestershire Wildlife Trust are already undertaking successful programmes along the canals.

Brimscombe Port, Area 8. Biodiversity is presented as a constraint (see earlier comment about the Placemaking Methodology, Document B), and not an opportunity. This, and the paucity of information about biodiversity (that ought to be presented as Evidence in the strategy about biodiversity), may be one of the reasons why the natural capital of the River Frome and associated wetlands is not acknowledged in the PFD for Brimscombe Port. For example Brimscombe mill-pond, is a known refuge and probable breeding site for otters, a European Protected Species, and there is an important floodplain woodland area next to this pond. The valley bottom land parcels are allocated to the Industrial Heritage Conservation Area (based on a

report that is often referred to) but the significant wildlife, as well as landscape and recreational value receives scant attention.

Chalford, Area 9. Here we support the carbon reduction opportunities shown in the PFD. However, the PFD appears to fail to correlate with the summary Wall Chart showing Chalford, where one of the green infrastructure and biodiversity related Ingredients is tree-planting ('X') along the canal corridor, in order to link canopies. This may be appropriate in some areas where trees have already been removed to make way for canal-side development (e.g. in the vicinity of Knapp Lane) but it is important to note that tree cover is high in many areas, and it would be useful to include here a requirement for the *retention* of existing treelines and hedgerows, particularly if the canal is to be restored. Retention would be of benefit for carbon lock-up as well as biodiversity.

Again, it is noticeable that the PFD for Chalford Area fails to pay any reference to the presence of large areas of valuable green infrastructure and biodiversity that are already present in the canal and river corridor. However, conversely the Wall Chart refers to '*strategically placed hubs, the focus of wildlife conservation and education programmes*'. '*MM Canal habitats and species*' are mentioned here between years 5 and 10 – this would be rather late if the development in and along the canal had destroyed these valuable assets. The explainer for this category (also used in the Eastern Upper Valley too) is as follows '*the canals of Stroud District are engineered waterways that flow through a river catchment basin comprising a diverse range of landscape characters. The watered canals, canal banks, rivers and adjacent landscapes are multi-layered habitats that contribute to widespread, biodiverse and interrelated territories sustaining fauna and flora. Recognising this aspect of the canal network is vital to sustaining, enhancing and supplementing different habitats throughout the District alongside their many people- and engineering-related functions*'. Whilst reference is made to the '*attractive environment and vacant land*' providing opportunity for housing along the canal corridor here, we are not entirely clear what action, if any, is meant to protect and enhance 'MM' apart from recognition of its existence in Years 5-10.

Finally, for reasons already stated, it is incredibly difficult to locate areas proposed for '*high standards of new housing development*', so it is not possible to comment on this.

Eastern Upper Valley, Area 10. Whilst improvements to footpaths and signage are to be welcomed, we do not believe that '*strategically placed 'hubs' that are a focus of wildlife conservation and education programmes*' are appropriate in this quiet river Frome catchment area.

4: Do you agree with the ingredients in general terms? Are there other ingredients you would like to identify? Do you agree with the ingredients identified for each canal strategy areas? Do you agree with the timeframes for delivery? Should some be brought forward and others pushed back?

Please see earlier comments which are more holistic in nature and cross refer to 'ingredients'. We do not believe that Placemaking is an appropriate methodology for drawing up a strategy for Stroud Canals, and that includes the use of Ingredients and timescales for delivery.

We have found it impossible to evaluate 'Ingredients' from the charts presented. In addition, there is no explanation as to how the ingredients are appropriated to the 'timeframes'. No underlying rationale is given for timescales. For example 'MM' (canal habitats and species) is given as Year 0 for Area 10, and Years 5-10 for Area 9. Another example is the approximate timescale for delivery given for 'H' 'active travel and dedicated routes' ('years 10-15). To what project is this delivery attached?

5. Do you agree that the canals strategy should be used as design guidance to support the delivery of adopted Local Plan Delivery Policy ES11? Would any changes to the canal strategy help to improve the delivery of Local Plan canal policy

No, we do not think these documents should be used as Supplementary Information. The strategy is not fit for purpose for all the above stated reasons. Delivery policy ES11 should also contain, Supplementary Planning Guidance relating to Ecology, Biodiversity, Landscape and Carbon Sequestration. Such Guidance will need to be based on an inventory of the existing ecological resource. We believe that if this was allowed to happen, then Policy ES11 would need to accommodate situations, such as the Eastern Upper Valley where the nature value and natural capital far exceeds attempts to restore the canal tract.

6. Other

Please see Section A of this letter for a more comprehensive coverage of our response. We have a question for SDC officers – do you really believe that this Strategy is fit for purpose? Is this a fair public consultation? Do *you* think that it is clear about which parts support current policies and which parts propose change? Please see above, (A) 'Our view' in this response.