



Planning Strategy,
Stroud District Council,
Ebley Mill,
Ebley Wharf,
Stroud
GL5 4UB.

c/o Gloucestershire Wildlife Trust
Robinswood Hill Country Park
Reservoir Road
Gloucester
GL4 6SX
Telephone: 01452 383333

Sent by email to:
canals.strategy@stroud.gov.uk

info@gloucestershirowildlifetrust.co.uk
www.gloucestershirowildlifetrust.co.uk

Registered charity number: 232580

Document reference: GWT- Stroud Canals Strategy response 2022.05

11/05/2022

Dear Sir/Madam

I am writing to provide Gloucestershire Wildlife Trust's (GWT) response to the Stroud Canals Vision and Strategy consultation. This includes responses to the specific consultation as well as other comments and concerns.

Firstly, GWT wishes to highlight that the consultation documents do not meet the accessibility standards that would be expected of Local Authority publications. Many of the diagrams and text are very difficult to read in digital or print versions. Whilst visual representation is helpful, it should be accompanied by a clear written explanation of key concepts, which is not always the case in these documents.

GWT welcomes the placemaking approach and supports commitments to enhanced green infrastructure standards. GWT strongly **recommends using the Building with Nature standards** to demonstrate delivery of this. The Trust **strongly objects to any proposal to restore a navigable canal east of Brimscombe** and is pleased to see that this is not included in the strategy. GWT has **five main concerns** about the draft strategy, which are detailed in the attached document.

- Weak alignment with local and National biodiversity policy and legislation.
- Lack of robustness and poor presentation of the ecological evidence base
- Insufficient safeguarding of existing biodiversity assets
- Inappropriate guidance for ecological enhancements
- Lack of integration of nature into the placemaking approach

If these issues are not addressed it is likely that developments will emerge, having been guided by the strategy, that do not comply with biodiversity legislation or local and national policy requirements. This could increase planning costs and time, which would be counterproductive to the purpose of a Supplementary Planning Document.



Gloucestershire Wildlife Trust recommends the following actions to improve the biodiversity content and approach of the strategy including

- Appoint a specialist ecological consultant to undertake a **Strategic Environmental Assessment of the biodiversity impacts**.
- Formally **rule out any restoration of the navigable canal east of Brimscombe, prioritising** this area for **nature** protection and enhancement.
- Align the strategy guidance with **the Gloucestershire Nature Recovery Network** and emerging **Local Nature Recovery Strategy**.
- Incorporate data held by the **Gloucestershire Centre for Environmental Records**
- Commitment to **at least 30% of land** within the canal corridor being **managed as wildlife habitat**.
- Set a requirement for developments within the canal corridor to **deliver a minimum 20% Biodiversity Net Gain**.
- Add a **profile assessment of biodiversity and natural capital value** along the canal corridor, similar to the one provided for carbon.
- Adopt a **triple bottom-line accounting approach** to decision making in order to protect natural capital and ensure that land-use change delivers net benefits for society.

Yours Sincerely



[Redacted]

[Redacted]

Gloucestershire Wildlife Trust

[Redacted]

[Redacted]



@gloswildlife

1. Biodiversity context

- 1.1. During the stakeholder consultation exercise, Gloucestershire Wildlife Trust (GWT) highlighted the locally, nationally and internationally important ecological assets of the canal corridor, wider Golden Valley and Severn Estuary. This includes eleven designated Local Wildlife Sites (LWS's) located within or adjacent to the corridor. Two of these cover the canal itself; the Stroudwater Canal LWS and the River Frome Mainstream and Tributaries LWS.
- 1.2. The nine additional LWS's located within or adjacent to the canal are Brimscombe Port, Frome Banks nature reserve, Frome Meadows, Trillis, Siccaridge Wood, Sapperton Common, Frampton Common, Tanners Wood and Lower Daneway.
- 1.3. The canal corridor sits in close proximity to seven Sites of Special Scientific Interest (SSSI), which are sensitive to increases in visitor pressure.
- 1.4. The canal corridor lies close to the Cotswold Commons and Beechwoods National Nature Reserve, Cotswold Beechwoods Special Area of Conservation and land that is functionally linked to the Severn Estuary Special Protection Area.
- 1.5. The canal corridor from Brimscombe eastwards runs along the Golden Valley, which is a strategically important part of Gloucestershire's Nature Recovery Network (NRN, Appendix 1). This area contains several areas of sensitive and irreplaceable wildlife habitat, including ancient woodlands and rare unimproved species-rich calcareous grasslands.
- 1.6. The Golden Valley has been identified as a Nature Recovery Zone (NRZ) by GWT's 2030 strategy. NRZ's are important focus areas for GWT's aim to halt and reverse wildlife declines with the people of Gloucestershire. They have been identified using the NRN and are based around GWT's biggest and best nature reserves (Appendix 2), where there are significant opportunities for delivering nature's recovery. There is land within the Golden Valley NRZ that would benefit from habitat enhancement, but most of the land adjacent to the canal already forms a core part of the NRN.
- 1.7. GWT owns or manages six nature reserves within the Golden Valley NRZ, all are within 150 metres of the canal and several include sections of canal.
- 1.8. GWT's Daneway Banks Nature reserve and linked sites along the Golden Valley supports a globally important population of the endangered large blue butterfly. The NRZ also contains Gloucestershire's only remaining population of the nationally endangered marsh fritillary butterfly.
- 1.9. The Golden Valley supports bat populations of at least county importance, including at least three of the UK's four Annex 2 bat species.
- 1.10. The Gloucestershire Centre for Environmental Records (GCER) contains hundreds of records of rare and threatened species along the canal corridor and adjacent habitats.

2. Legislative and policy compliance

- 2.1. As a Supplementary Planning Document (SPD), the strategy must present an approach that is compliant with biodiversity legislation, and national and local

planning policy. It is disappointing that key policy and legislation is not outlined in the supporting documents. GWT's response is provided with biodiversity policy and legislation requirements in mind.

2.2. The strategy does not display a good understanding of the distinctive biodiversity assets in this area, for example, Document A proposes contiguous tree planting, which could be damaging for ecological networks, protected sites and threatened species.

2.3. Because the distinctive biodiversity assets are not integrated into the strategy, GWT is concerned that developments guided by may not be compliant with legislation, policy and Stroud District Council's own Strategic Plan.

2.4. Legislation

2.4.1. GWT will not provide an exhaustive list of requirements covered by each Act. Key requirements are summarised along with suggestions as to how compliance can be assured.

2.4.2. Environment Act 2021

Developments will be required to deliver a minimum 10% Biodiversity Net Gain (BNG). GWT proposes that the strategy should commit to a minimum 20% BNG to reflect the biodiversity importance of this landscape within the NRN and Stroud District Council's 2030 strategic vision and aims. An assessment is needed to determine whether the strategy is achievable alongside BNG requirements, noting that BNG is not possible where irreplaceable habitats are affected.

A New Local Nature Recovery Strategy (LNRS) will be created for Gloucestershire and Local Authorities will be required to demonstrate how they are contributing towards delivering this. The LNRS is under development and should be referred to within the canal strategy. Development should be guided to safeguard and enhance the Nature Recovery Network and contribute to LNRS outcomes.

The Environment Act amended the *Natural Environment and Rural Communities Act 2006* (NERC Act 2006) to require public authorities in England to report on how they have taken action to conserve and enhance biodiversity. The canal strategy should include a suitable performance measure to demonstrate this.

Species and protected site conservation strategies will be published across England. The canal corridor is surrounded by designated biodiversity sites and supports important populations of several protected and Section 41 species. The current strategy does not acknowledge this constraint and the continuity assessments and ingredients outlined in Document A do not demonstrate that the needs of these ecological assets are understood.

2.4.3. The Conservation of Habitats and Species Regulations 2019

The canal corridor either supports or is very close to important populations of multiple species protected under these regulations. Not least the world's largest population of the Large blue butterfly (*Maculinea arion*) and at least three of the UK's four Annex 2 bat species.

2.4.4. Wildlife and Countryside Act 1981

- Provides legal protection to nesting birds and specific species of conservation concern, several of which can be found along the canal corridor.
- Legislates against actions that drive the spread of non-invasive species, which the canal strategy has the potential to cause.
- Covers designations of SSSIs, some of which could be adversely impacted by the canal strategy due to increased recreational pressure.

2.5. Policy

2.5.1. The National Planning Policy Framework (NPPF) requires policies to guide developments that

- *Minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures (174d).*
- *Safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them (para 179a).*
- *Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species (para 179b).*

2.5.2. The adopted 2015-2031 Stroud Local Plan contains Strategic Objective SO6 which seeks to

- *Minimise the impact of development on biodiversity*
- *Deliver place shaping that protects and enhances local biodiversity.*
- *Avoid the degradation of local ecological networks*

This adopted Local Plan is unlikely to be sufficient to meet the strengthened requirements of the Environment Act. The 2021 Local Plan Review addresses these issues, primarily through policy ES6. Key policy commitments relevant to the Canal Strategy are

- *Development proposals shall provide a minimum of 10% net gain in biodiversity through enhancement and creation of ecological networks within and connecting with those beyond the district.*
- *Development proposals within, or in close proximity to, an ecological network corridor should enhance the functionality and connectivity of the corridor. Development that would impact on the strategic ecological network causing fragmentation or otherwise prejudice its effectiveness will not be permitted*
- *Development should not adversely affect Local Wildlife Sites.*

2.5.3. The Stroud District Council (SDC) 2030 Strategy has an admirable focus area to deliver positive outcomes and increased resilience for all species. Targets that could be impeded by the Canal Strategy as it currently stands are

- T9 - *To support an increase of 48% of bio/geodiversity sites to 100% in 'positive condition'.*
- T10 - *To ensure complete nature corridors in development across the District and beyond, doubling the 11% of land use classified as 'natural'.*

3. Key overarching concerns

In addition to the canal strategy guiding developments that align with policy and legislation, GWT has four further overarching concerns about the draft canal strategy.

3.1. Concern 1: Robustness and presentation of the ecological evidence base

- 3.1.1. Gloucestershire Wildlife Trust (GWT) is very disappointed that the draft strategy does not reflect the locally, nationally and internationally important ecological assets of the canal corridor, wider Golden Valley and Severn Estuary. It also doesn't appear to be guided by the NRN.
- 3.1.2. During the stakeholder engagement exercise GWT clearly outlined the ecological assets and constraints in this landscape and recommended sources of information to help shape the strategy (Evidencing the Strategy document pages 56-57). The draft strategy does not reflect this advice and information.
- 3.1.3. The underuse of local knowledge and data means that the strategy has poor integration of the biodiversity that plays a major role in the distinctiveness of this landscape. Many of GWT's subsequent concerns fundamentally stem from this issue.
- 3.1.4. A search of GCER would have revealed the extensive clustering of designated biodiversity sites and threatened species records along the canal corridor.
- 3.1.5. Section D8 of the 'Evidencing the strategy' document misrepresents the role of GWT in the Cotswold Canals Connected project. GWT is not the lead partner and this information should not have been presented as the views of GWT. As a delivery partner of Phase 1B, GWT is supportive of this project. However, the Trust has been consistently clear that its involvement is restricted to Phase 1B. Information from this project does not reflect GWT's support for wider canal development and our understanding is that the information about the project presented in the consultation documents is considerably out of date.
- 3.1.6. GWT feels that consultation documents do not present the adverse impacts on biodiversity for public consideration. Public awareness of the existing biodiversity value of the canal corridor and Golden Valley may be low, so it is important that members of the public are empowered to provide their views based on the full picture of pros and cons.
- 3.1.7. Whilst illustrative presentation of spatial strategies can be incredibly useful there is insufficient supporting text with the documents to properly explain the strategy. Constraints and proposals to overcome or mitigate these is a critical missing area.

3.2. Concern 2: Safeguarding of existing biodiversity assets

- 3.2.1. As a consequence of the inadequate ecological evidence base the strategy includes approaches that may not safeguard existing ecological assets. For example, ingredient X 'Linking the canopy' could be ecologically damaging in several locations, disrupting grassland and wetland networks within the NRN.
- 3.2.2. The strategy does not reflect SDC's experience of managing the adverse impacts of recreational pressure on designated biodiversity sites. Recreational pressure is a threat to the condition of several designated sites along and close to the canal corridor, both through disturbance of wildlife and the compaction and erosion of vegetation. The strategy does not appear to have considered this issue with both the profile criteria and ingredients promoting projects that would increase recreational pressure in some of the most ecologically sensitive sections.
- 3.2.3. The canal strategy needs to safeguard against increasing recreational pressure on designated sites and core parts of the NRN, where this is a threat to the key ecological assets. This includes, but is not limited to, land within or functionally linked to the Severn Estuary SPA and Cotswold Beechwoods SAC.
- 3.2.4. As a result of the issues outlined in section 3.1 and 3.2, GWT questions whether the draft strategy would result in projects that can fulfill the Council's legal duties to protect and enhance biodiversity, particularly in relation to ecological networks, designated sites and protected species.
- 3.2.5. If the canal strategy guides projects that aren't compliant with biodiversity policy and legislative requirements this could increase planning time and costs later on.
- 3.2.6. GWT recommends that a Strategic Environmental Assessment is undertaken. This is because there are likely significant environmental effects on biodiversity that have not already been assessed during the preparation of the canal strategy as an SPD.

3.3. Concern 3: Inappropriate guidance for ecological enhancements

- 3.3.1. The strategy suggests universal benefits for biodiversity can be achieved through Biodiversity Net Gain and improved ecological connectivity. It is likely to be difficult to achieve net benefits for biodiversity by developing the canal corridor from Brimscombe eastwards due to the high quality and connectivity of existing habitats. A biodiversity offsetting approach would not be acceptable in this area.
- 3.3.2. GWT objects to the strategy proposing extensive development or any restoration of the navigable canal within the section east of Brimscombe, Chalford and the Upper Eastern Valley due to the adverse impacts on biodiversity, which are likely to be large and significant. GWT suggests that the main strategic driver along this section should be to protect and enhance existing habitats and ecological networks. This could become an exemplar approach to demonstrating SDC's action for the ecological and climate emergencies.
- 3.3.3. There are opportunities for development that delivers net benefits for biodiversity west of Brimscombe. Such projects are welcomed as long as they are guided by comprehensive ecological appraisals and the NRN.
- 3.3.4. The 'Canal Habitats and Species' ingredient is too general. The text could broadly apply to linear wetland systems anywhere in the UK and does not demonstrate an

understanding of the distinctive and significant biodiversity within the canal corridor.

- 3.3.5. The 'Wild Banks' ingredient does not demonstrate a strong understanding of ecological features or land management practices. Managing land for human and wildlife use is a delicate balance that is difficult to achieve. This challenge needs to be reflected in the strategy, with acknowledgement that some uses will be incompatible in some locations.

3.4. Concern 4: Integration of nature into the placemaking approach.

- 3.4.1. GWT is pleased to see a placemaking approach. Two key principles of placemaking are that it is collaborative and reflects the distinctive existing qualities of a place. GWT is therefore disappointed that important biodiversity assets and concerns raised at stakeholder engagement are not reflected in the draft strategy documents.
- 3.4.2. Biodiversity plays a major role in shaping the natural environment of the canal corridor and the natural environment is a vital component of place. GWT feels the natural environment is underrepresented in the draft strategy.
- 3.4.3. The Royal Town Planning Institute highlighted the importance of placemaking to tackling the climate and ecological emergencies¹. It recommends that the two are addressed together and written into planning policy and guidance documents. GWT welcomes the assessment of the carbon emissions profiles as a forward-thinking approach. Adopting a similar approach for biodiversity and natural capital would put tackling the ecological and climate issues at the heart of the strategy.
- 3.4.4. GWT supports a multi-functional land-use approach, but all uses will not be appropriate in all locations. Different interest groups (e.g. biodiversity, heritage, access, housing) that will be calling for projects along the canal corridor. It will rarely be possible to satisfy all wishes along every section of the canal, so a robust prioritisation and decision-making framework is needed.
- 3.4.5. GWT proposes adding a transparent decision-making framework based on a significance hierarchy for receptors and opportunities. This will avoid a development or project of local significance damaging existing receptors of county or national significance. It will also avoid important projects being overly delayed by constraints of minor significance.
- 3.4.6. Biodiversity underlines natural capital, which provides a wide range of valuable services to people and the economy. The draft strategy and project development template stand do not integrate natural capital into decision making. A triple bottom-line accounting approach is recommended to protect natural capital and ensure that maximum benefits are realised.

Consultation questions

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

- 4.1. GWT welcomes the approach of prioritising the drivers within different sections of the canal corridor, but the driver descriptions and principles are very broad, so it would be relatively easy for any project or development to argue a case for alignment. What could have a beneficial or neutral impact on ecological continuity in

¹ https://www.rtpi.org.uk/research/2021/march/place-based-approaches-to-climate-change/#_Toc66462295

one section might be wholly inappropriate in another.

4.2. The ingredients and profiling criteria appear to be the tool to support fine-scale decision-making, but they are largely a poor match for the distinctive ecology of each section as a result of deficiencies in the evidence base. GWT's concerns with the profile scoring are covered in the following sections

4.3. Specific comments on continuity

4.3.1. Continuity may not be the most appropriate word for a driver of change because it could be interpreted as maintaining the status quo. Where land-use currently offers few benefits for wildlife and people this would be undesirable. Connectivity might be more suitable as this gives an impression of driving positive change as well as protecting existing strengths.

4.3.2. Along some sections of the canal corridor maintaining existing ecological connectivity is a priority of county if not regional importance. The canal corridor already forms part of an east-west ecological corridor, connecting designated biodiversity sites and core areas of the NRN. There are some opportunities to enhance this connectivity, but few are east of Brimscombe. It is very important that the existing ecological connectivity along the canal corridor is not adversely affected by the canal strategy.

4.3.3. The Eastern Upper Valley and Chalford sections of the canal have high scores for continuity drivers. The profile criteria descriptions for these scores indicates a desire for projects that would increase recreational pressure on these most ecologically sensitive parts of the canal corridor, which GWT would be concerned about.

4.3.4. Engineering resource is cited as a priority along the Eastern Upper Valley and Chalford Sections. Whilst GWT does not object to preservation of historic features along the disused canal, the Trust strongly objects to a strategy position that would support restoration of a navigable canal within the phase 3 area.

4.4. Specific comments on crossings

4.4.1. The canal corridor can play an important role in making access to nature more inclusive. GWT supports the ambition to promote this, although crossings are just one of multiple barriers that need consideration. Others include towpath design, creating welcoming spaces, providing activities that appeal to a wider range of audiences and the quality of habitat along the most accessible parts of the canal corridor.

4.4.2. GWT supports improving access to some sections of the canal corridor but does not support providing widespread human access to both banks. This would undermine important undisturbed habitat for protected species such as otter and water vole, as well as nesting birds. In some locations it could increase recreational pressure on priority habitat, designated sites and significant trees that are sensitive to trampling or engineering work.

4.4.3. The section profiles for this driver should be sense checked through a Strategic Environmental Assessment, extending to important habitat and designated sites within walking distance of the canal. Especially those that form new circular routes to land linked to the Severn Estuary SPA or Cotswold Commons SSSIs, as these sites are sensitive to increased dog walking.

4.5. Specific comments on clustering

- 4.5.1. GWT welcomes inclusion of biodiversity as a key principle of this driver, which is appropriate considering the significant cluster of biodiversity assets along the canal corridor (see section 1). It is disappointing that the description of this driver has a narrow focus on the built historic environment.
- 4.5.2. The driver profile criteria do not reflect all of the principles. There is very little mention of nature and the key role it plays in shaping the distinctive identity of the corridor, which pre-dates much of the built environment. The value of existing clusters of natural habitat and designated sites are overlooked as a consequence.
- 4.5.3. Adding natural habitat creation and enhancement to the clustering profiles would serve three purposes.
 - Demonstrate a contribution to tackling the ecological emergency
 - It could unlock new local green space to improve access to nature whilst relieving pressure from designated sites
 - It provides investment opportunities through biodiversity net gain and offsetting.

4.6. Potential missing drivers

- 4.6.1. The climate and ecological emergencies are a key driver influencing the future of the canal corridor. As mentioned in section 3.4.3, the RTPi recommends that these issues are put at the heart of placemaking approaches. GWT is pleased to see positive themes around carbon emissions and active travel in the draft strategy, however, there are no meaningful commitments to tackling the ecological emergency. The natural environment is also not featured in the strategy to the extent that would be expected from a placemaking approach.
- 4.6.2. GWT proposes that a fourth driver is added that combines the climate and ecological emergencies to ensure that future projects and developments support rather than hinder the ambitions of the Council to tackle these issues. Key Performance Indicators could be
 - At least 30% of the corridor being managed as wildlife habitat by 2030
 - A net increase in natural capital and nature-based solutions by 2030.

5. Question 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?

- 5.1. The sections profiles are not easy to interpret. Labelling the sections as 1-14 would make it easier to respond. The arrows and coloured polygons on the section profiles are not clearly keyed. An OS base map would be helpful to accurately determine the locations.
- 5.2. The carbon profiles should include how much carbon is estimated to be stored in existing natural capital along the canal corridor. This information is available through the Gloucestershire Local Nature Partnership Natural Capital maps.
- 5.3. The sections appear to be based on the location of key settlements. GWT would

prefer to see a combination of this and natural environment features, which play an important role in distinctive identity along the canal corridor.

- 5.4. All section profiles should include ecological and natural capital opportunities. This would help demonstrate alignment with the NPPF, Environment Act and NERC Act duties. The sections profiles should also list the key constraints and ecological assets that will need safeguarding.
- 5.5. GWT's primary concerns are in the sections from Brimscombe Port eastwards. The Brimscombe profile does not recognise that the canal corridor contains two designated LWS's. A principle of protecting and enhancing these sites should be included. Building with Nature could be a good tool to support this.
- 5.6. From Brimscombe Port eastwards the impact of any developments or projects will need to be sensitive of bat populations, with modification of existing buildings and additional lighting potential issues
- 5.7. The Chalford section does not recognise the LWS's in and around the canal in this area. The aspiration for additional canal and water frontages may be detrimental to the cited features of these sites.
- 5.8. GWT is very disappointed that it was not consulted on the Eastern Upper Valley section proposals before the draft was published. The extent of GWT's land ownership, activities and relationships with partners and landowners in this section were made clear during the stakeholder discussions. Several of the proposed approaches directly affect nature reserves owned or managed by GWT.
- 5.9. The Eastern Upper Valley is an important and highly sensitive ecological area that is critical to Gloucestershire's NRN and contains ecological assets of county, national and international importance. GWT welcomes recognition that safeguarding of the ecological aspects will be required, but disagrees that this can be achieved through horticultural, engineering or green infrastructure solutions. This is a landscape rich in semi-natural priority habitats and landscape architecture solutions cannot mitigate the adverse impacts of developments.
- 5.10. GWT is concerned about the proposed significant growth of a tourism experience. The Slimbridge comparison is completely inappropriate as a model for this location because it is a very different ecological landscape. The strategy must not promote an approach that would increase visitor pressure on sensitive designated sites and core parts of the NRN. This area supports important areas of national priority habitat and globally threatened species that could suffer as a result.
- 5.11. A key issue is a lack of publicly owned semi-natural green space and facilities (e.g. parking) to cater for increased visitor numbers. Within some parishes, GWT nature reserves account for over 90% of the publicly accessible semi-natural green space. Whilst low visitor numbers are manageable at these reserves, their primary purpose is to safeguard the special wildlife they contain. Many of the footpath routes in this area pass through multiple designated biodiversity sites.
- 5.12. This proposal requires significant new areas of publicly accessible green space and walking routes, which are less ecologically sensitive but provide suitable experiences so that visitors are not drawn to designated sites. On site signage is ineffective at managing visitor pressure, so provision of alternative destinations is the most important solution.

6. Question 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?

- 6.1. Some information relevant to this question is provided in GWT's response to the previous question (see section 5) and will not be repeated here.
- 6.2. The diagrams and text in all sections need to be amended to integrate ecological assets in these locations.
- 6.3. All carbon reduction opportunities need to include the protection of existing natural capital that sequesters and stores carbon, as well as opportunities to expand carbon sequestration through natural capital. This should not be limited to tree planting and GWT advises that the Natural England Research Report NERR094² is used as guidance.
- 6.4. Carbon costs should include the supply chain costs of restoring a navigable canal.
- 6.5. All sections should have an ecological and natural capital outcomes column to demonstrate action against the ecological emergency and compliance with the Environment and NERC Acts.
- 6.6. Transport infrastructure can be a source of habitat fragmentation. Proposals to align and intertwine them, such as those at Brimscome, could exacerbate the adverse effects of this and should be assessed.
- 6.7. The diagrams and text for the sections east of Brimscombe largely omit their important natural heritage and suggest some actions that could be detrimental to this. This should be amended throughout.

7. Question 4a: Do you agree with the ingredients in general terms? Are there other ingredients you would like to identify?

- 7.1. There are a lot of ingredients. The decision-making process will need to assess projects that benefit some ingredients but adversely impact others. The framework for this process should be included in the strategy along with some requirements for all projects to meet e.g. alignment with the Local Nature Recovery Strategy and NRN.
- 7.2. As stated previously, GWT is disappointed that the ingredients related to biodiversity do not reflect a strong knowledge of the distinctive and special ecology of the canal corridor.
- 7.3. Concern regarding the aspiration and delivery of the 'Linking the Canopy' ingredient are covered in section 3.2.1.
- 7.4. The 'Connecting the Banks' ingredient could undermine important undisturbed wildlife habitat (see section 4.4.2), including habitat used by protected species such as otter, water vole and bats. Particular issues will arise where human access is provided along both banks for sections of sufficient size to fragment habitat if disturbance levels degrade habitat or make it unsuitable for protected species. Dog walking access will be an important factor in this respect.

² <http://publications.naturalengland.org.uk/publication/5419124441481216>

- 7.5. GWT suggests that the ingredients could be improved by adding a 'Nature's Recovery' ingredient. This should cover Biodiversity Net Gain and set an overall ambition for at least 30% of the canal corridor being managed for wildlife habitat. With careful design this can be delivered within multi-functional spaces. However, not all uses will be complementary to creating or protecting good quality wildlife habitat, so this should be dealt with on a case-by-case basis rather than setting broad principles in each section.
- 7.6. Providing more opportunities for people to connect with nature is welcomed. GWT has extensive experience of running nature-based learning activities. The classroom hubs and the activities will need careful design to ensure that protected species are not disturbed. The hubs should also be accessible and attractive to a wide range of audiences. GWT recommends that the financial sustainability of these hubs is planned in detail before they are developed because this is a significant challenge for outdoor learning provision.
- 7.7. GWT supports the 'Building for Nature Interventions' ingredient and suggests that this should refer to Building with Nature or similar Green Infrastructure standards in the emerging Local Plan. GWT wishes to reiterate that it is unlikely to be possible to suitably mitigate the adverse effects of new development on ecological networks east of Brimscombe through green infrastructure design.
- 7.8. GWT cautiously welcomes the 'Natural Wayfinding' ingredient. Delivery of this will need careful assessment of the risk to existing biodiversity assets from increasing access to them. The creation or enhancement of public green spaces that can alleviate pressure on ecologically sensitive sites along the corridor would be supported. This ingredient must not rely on the provision and management of existing natural green spaces by eNGO's such as GWT.

8. Question 4b: 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?

- 8.1. GWT has concerns with some of the ingredients identified for the Brimscombe, Chalford and Eastern Upper Valley sections. Some of these concerns are covered in previously (see sections 3.2, 3.3, 3.4 and 5) and will not be repeated in detail here.
- 8.2. Brimscombe section
- 8.2.1. More information is required to determine if ingredient A is appropriate in this section. How would public green space be provided and what does unlocking the natural environment's strategic functions mean?
- 8.2.2. Ingredient X would need to be nuanced in this section to reflect that the desirable outcome is a connected mosaic of woodland, riparian and open habitats.
- 8.2.3. Branding and waymarking plans should engage landowners along the corridor. There is already a lot of interpretation infrastructure along the corridor and some stakeholders will not wish to see more or switch to a canal focused branding.
- 8.2.4. GWT supports the Wild Banks ingredient in this location, which could help to enhance the LWS. GWT notes that the LWS is not reflected prominently in the master plan for the Brimscombe Port development.
- 8.2.5. Ingredient MM needs to be more specific to the ecology of this section.

8.3. Chalford section

- 8.3.1. Ingredient X would need to be nuanced in this section to reflect that the desirable outcome is a connected mosaic of woodland and riparian habitats
- 8.3.2. If there is an aspiration for 'canal side living' through regeneration, this must come with 'Building for Nature' interventions within the same timeframe. Impacts on the designated Local Wildlife Sites must be avoided.
- 8.3.3. Concerns previously expressed about connecting the banks, wild banks and habitats and species ingredients apply to this section.

8.4. Upper Eastern Valley section

- 8.4.1. Ingredient X would have to be very carefully considered in this section, which contains important open grassland habitats and wetlands. Tree planting in some locations may be beneficial but it must not disrupt other ecological networks.
- 8.4.2. Various ingredients suggested for this section would increase visitor numbers. As mentioned previously (see section 3.2) increased visitor pressure would threaten sensitive national priority habitats and protected species along this section. Such activities would have to be carefully managed, restricted to hubs of low ecological value and assessed for any adverse ecological impacts.
- 8.4.3. The ingredients indicate an aspiration to increase public access and use of existing public spaces along this section. This is not desirable without increasing the amount of publicly accessible green space within this area. Much of the existing greenspace falls within designated sites, several of which are owned or managed by GWT. The primary function of this land is to protect important ecological assets and they cannot function as canal side or country parks.
- 8.4.4. Mountain biking is a recognised threat to several designated biodiversity sites in Stroud District. At present it is not a threat to the sensitive grassland and ancient woodland habitats in the Upper Eastern Valley, largely due to poor access. Due to the steep valley slopes these sites have the potential to attract mountain bikers if access is improved. The adverse impacts must be avoided to safeguard the nationally and internationally important grasslands and woodlands.
- 8.4.5. GWT is concerned that some elements of CC would have an adverse effect on the ecological assets within this section, especially wind farms, solar farms and hydro-schemes. GWT would support measures such as roof-top solar panels.
- 8.4.6. GWT has similar concerns about the application of ingredients MM, JJ, S and NN within this section as expressed for the Brimscombe and Chalford sections.

9. Question 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?

- 9.1. GWT supports the principle of a Supplementary Planning Document (SPD) to shape development along the canal corridor. This is a complex landscape that has a lot of existing value and as such is highly constricted. An effective SPD would support good quality development where there is potential to deliver multiple benefits without degrading existing assets.
- 9.2. GWT's view is that the draft canal strategy cannot be an effective SPD because it

does not sufficiently align with biodiversity policies in the current and emerging Stroud Local Plan, The SDC Strategic Plan and the NPPF or biodiversity legislation outlined in section 2.4.

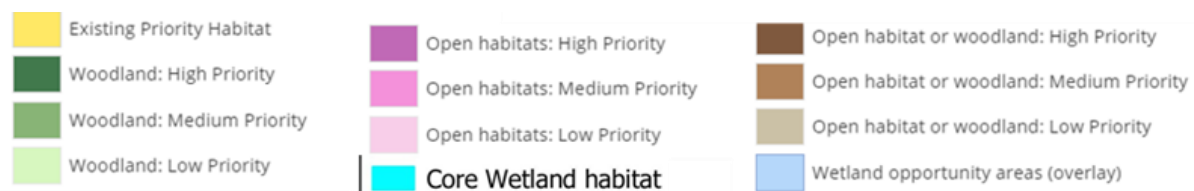
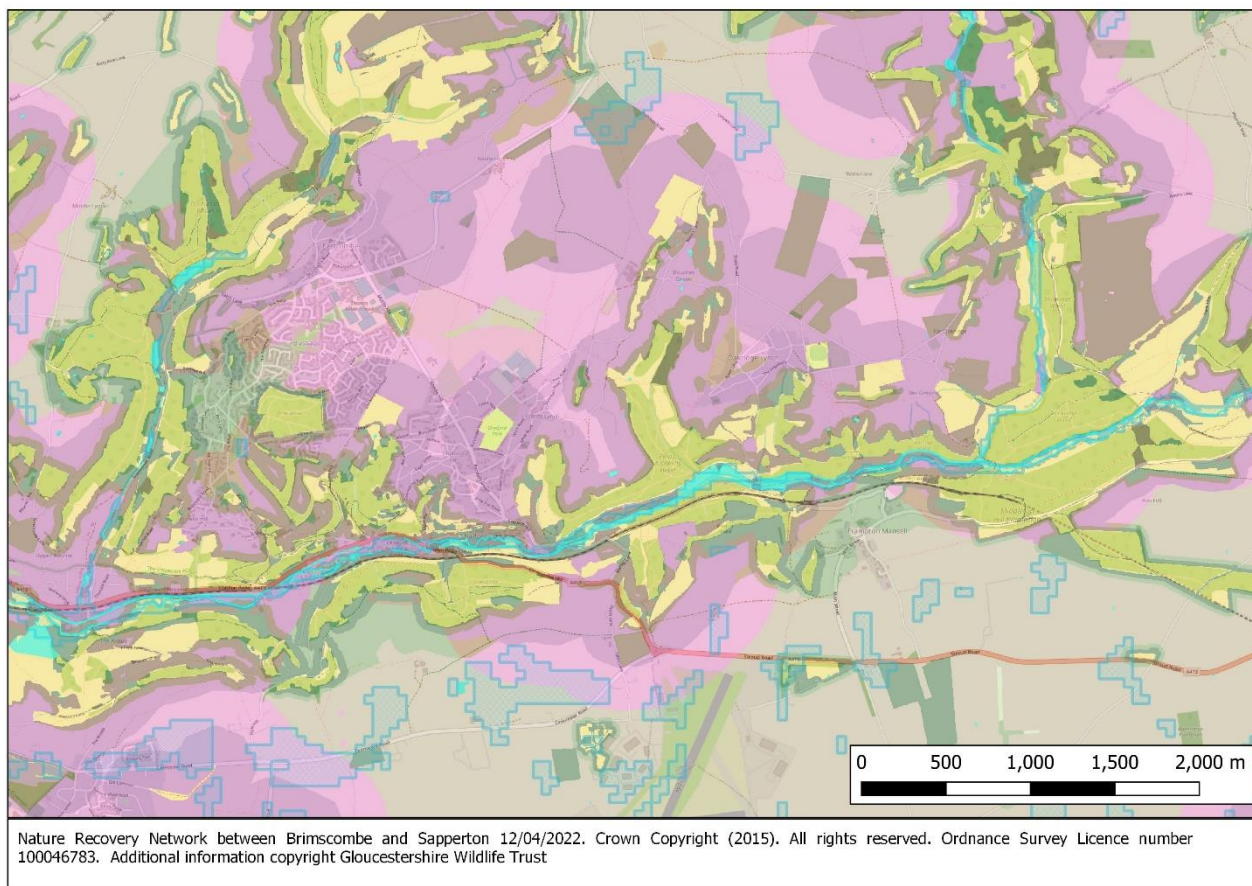
9.3. In particular, GWT is concerned that the draft strategy does not understand or safeguard the important designated ecological assets within the canal corridor. Therefore, it would provide design guidance that is likely to be inappropriate and challenged at the application stage. This would risk slowing down the planning process, which is counterproductive to the purpose of an SPD.

9.4. GWT objects to the principle of promoting development of the canal in the Upper Eastern Section, which is incredibly rich in biodiversity, containing large parts of the core NRN and multiple GWT nature reserves. The Brimscombe and Chalford sections are also important biodiversity areas, but some sensitive, well-planned development that delivers >20% Biodiversity Net Gain might be acceptable here.

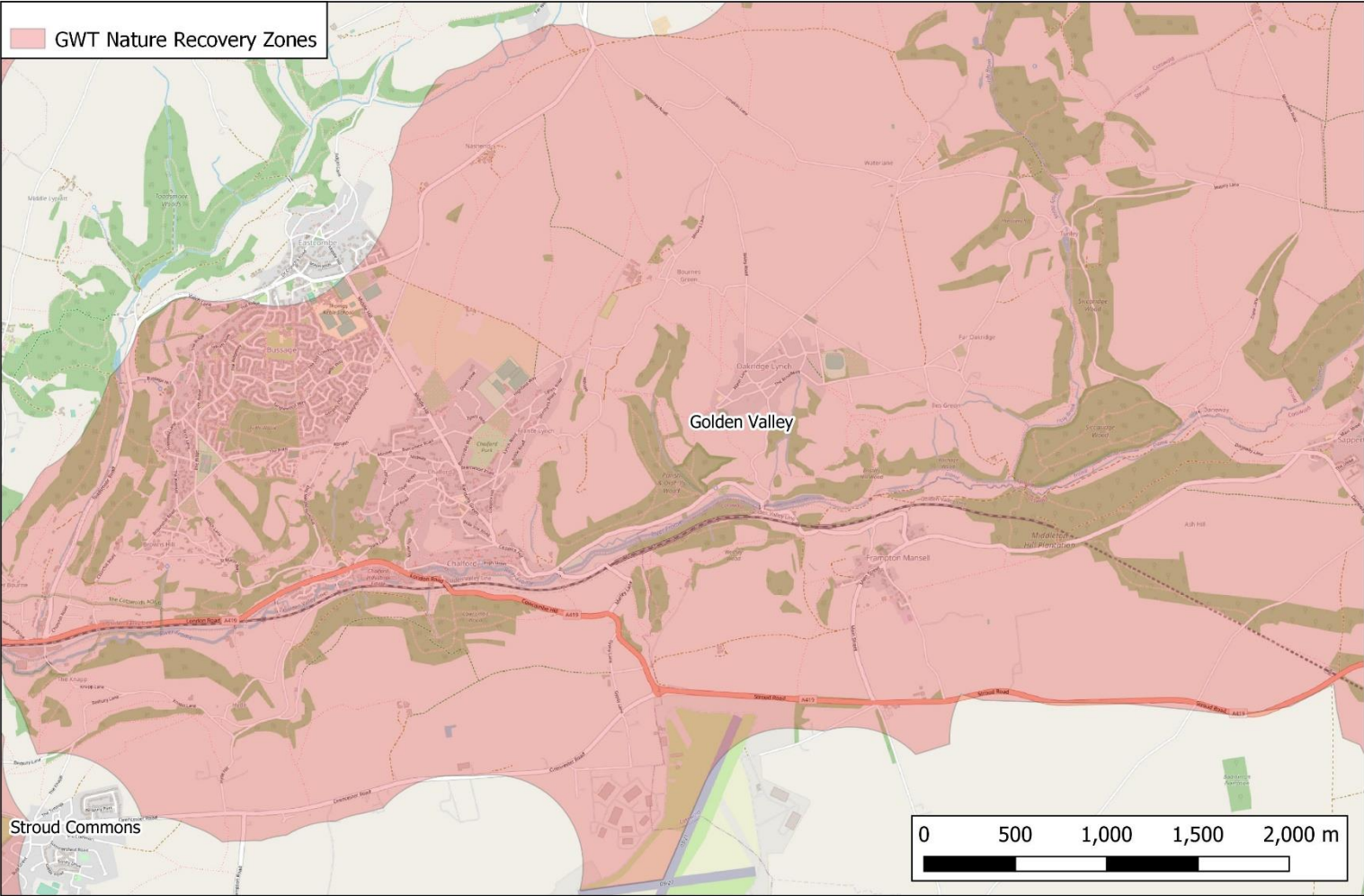
10. Question 5b: Would any changes to the canal strategy help to improve the delivery of Local Plan canal policy?

10.1. GWT has made several suggestions for improvements to the strategy. The natural environment is not well integrated into the placemaking approach taken here. Sections two, three and the covering letter outlines GWT's concerns and suggested solutions that are viewed as essential to the canal strategy becoming a fit-for-purpose SPD.

Appendix 1: The Gloucestershire Nature Recovery Network along the canal corridor. Available to view in detail online at <https://naturalcapital.gcerdata.com/>



Appendix 2: Gloucestershire Wildlife Trust's Golden Valley Nature Recovery Area in relation to the canal corridor.



Golden Valley Nature Recovery Zone between Brimmscombe and Sapperton 12/04/2022. Crown Copyright (2015). All rights reserved. Ordnance Survey Licence number 100046783. Additional information copyright Gloucestershire Wildlife Trust