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Sent: 14 April 2022 10:12
To: _WEB_Canals Strategy
Subject: Canal Strategy response

Categories: Canal Strategy 2022 response

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Dear SDC

I write in response to your Stroud Canals Strategy consultation document.

As background I should say that I worked for British Waterways for over 20 years as an ecologist and heritage advisor. That work included close involvement in initial scoping and practical implementation of multiple canal restorations, including the Forth & Clyde, Union Canal, Rochdale, Huddersfield Narrow, Montgomery, Grantham, Pocklington, Kennet & Avon, Chesterfield and many others. These all involved much public consultation and determination of very complex issues.

Locally I was part of the British Waterways team who scoped the Cotswold Canals restoration in the 2000s and who successfully acquired HLF funding for the Stonehouse to Bowbridge section. I am pleased to see that the current section being restored, from Stonehouse to Saul, includes many of the features, including the wider wildlife corridor of wetlands and orchards, that we proposed for that length in our scoping.

Re the current consultation on your proposed strategy I'm sorry to say that my first comment is that the consultation documents are not fit for purpose. Canals issues can be complicated, and consultations on strategies are necessarily complicated as a result, but there are ways to communicate these. The huge chart that you have issued for consultation is unviewable on any home pc (let alone a tablet!) without zooming in so far that the context is lost. Add in that multi-pane spreadsheet and you have a combination of documents, written in management-speak, that are inaccessible and impenetrable to most. These are the format of working documents for in-house working groups and partner bodies, not the format for public consultation.

This is not, therefore, an effective consultation and the responses you get will be limited to those who have trawled through the whole lot for days on end. It would have been far more helpful - and far more effective - to split the documents up conventionally into A4 sheets and produced a readable (and for those who want it) printable document. Still complex but actually viewable. Unless you do this - run the consultation with the chart and the spreadsheets split into A4 pages - the consultation will be flawed.

Because of these constraints I cannot comment in detail on most of it as it is effectively unavailable without studying it for a week.

Instead I will make some general comments, particularly about restoration process and definition, biodiversity issues and, in location terms, particularly about strategy areas 9 and 10, Chalford and the Eastern Upper Valley.

On restoration process and definition it seems, from an initial scan of the whole suite of documents, that these are not addressed. That may seem fine for an overview strategy for the whole canal system in the district, but the issues

are actually fundamental, particularly for those areas 9 and 10. Your Delivery Policy ES11 also fails to define what 'restoration' means.

That might be naïve or, if SDC wants to hedge its bets, might be cunningly deliberate, as 'restoration' can mean anything from a whole suite of concepts. The usual assumption is that it means 'restoration to boat traffic' but, at the other end of the scale, it can merely mean halting dereliction, stabilising structures and making them safe and celebrating the canal as a linear park. The former approach costs millions, and can be massively destructive during the process. The latter costs relatively little but can still open up the canal for the vast majority of users - i.e. towpath walkers and cyclists - and catalyse many of the wider benefits.

Another aspect to those options is sustainability. Restoration to navigation not only costs a lot to achieve but also costs a lot to maintain. Those costs are, of course, why many canals fell into disuse in the first place and why virtually all still run at a loss and are now mostly run by the CRT charity. The flurry of canal restorations across the country in the 1990s and 2000s is, almost certainly, unsustainable and it is reasonably likely that some will fall back into disuse (in navigation terms) within the next 10 years. This possibility must be considered for upper sections of the T&S Canal - where initial restoration to navigation would be very tricky and expensive and where water supply and other issues may make the whole exercise pointless a few years later. A different definition of restoration may be much more sensible on this section. It could take the form of a phased process - aiming ultimately for 'full' restoration but, more sensibly, going for the linear park option for now.

Another angle to this - not acknowledged in your Delivery Policy ES11 - is impact of any restoration process. Your policy refers to developments adjacent to the canal having to respect character, setting, biodiversity etc, but the policy does not reference the canal restoration itself as a 'development', it merely talks of 'improvements'. But restoration, certainly to navigation standard, of the canal in, again, areas 9 and 10 will undoubtedly be development. The process will be hugely disruptive in the Chalford -Sapperton length. Here the canal is in a rural valley bottom, adjoining the river closely often in a constrained and wet corridor. To restore this to navigation major engineering will be needed on the canal channel and banks, with much reconstruction and relining. The locks need substantial rebuilding, as will the side ponds above each of them. Such work will involve a huge engineering contract, possibly several contracts over many years, creating huge disruption locally, on already narrow and tricky roads. The works may well, because of the scale and length involved, last months, even years, for each part. There would be a haul road alongside the canal, or within it, itself a project that would cause massive disturbance and, in biodiversity terms, obliterate everything currently in the canal corridor. That level of disturbance cannot be dismissed as improvement - it is development.

This brings up biodiversity impacts, and on a general note I would suggest that the overall strategy seems to fail to properly recognise, in biodiversity terms, the significant existing biodiversity interest of the canal. It seems to assume that restoration will automatically improve biodiversity value. This is not necessarily the case - and I would guess the assumption is based on the rather casual assumption that restoration to open water is automatically better for biodiversity. But in many instances it may not be.

The Chalford -Sapperton length has very high existing biodiversity value, both as a corridor itself and also because of adjoining land interest. The strategy does reference this, but does not acknowledge that restoration, depending on what that actually is, may well destroy such existing interest. In Siccaridge Woods, for example, restoration of the canal to a navigable water channel will inevitably mean a scar - effectively a ride with a water channel in it - through the woods. That might seem fine as a concept, but actually it would break habitat continuity through these woods, in a way that is, in many ways, no different to building a road through. Worse than a road for many species as a road can be crossed (albeit at risk of being run over) but a water channel is a constant physical barrier. Such a break would compromise, amongst other species, the dormouse interest. There is no way that could be adequately mitigated to provide the same habitat continuity as now. And that's just one example - albeit a particularly important one and, as the woods are SSSI and Dormice are a protected species, it is a legal constraint too. I could list

many more issues, including the bat use of the corridor being particularly important, but this brief example should suffice to flag up that there are major constraints which must be acknowledged.

The Strategy does recognise 'the unique ecological and heritage qualities of this upper valley area' as a 'selling points for the landscape character and tourism experiences on offer' but it fails to acknowledge the real risk that the canal restoration - whatever that means - could destroy that quality. This is either naïve or disingenuous.

Within the BW team in the early 2000s, when we assessed this upper section and discussed these problems, the linear park option (i.e. not restoring to navigation) was actively discussed as a pragmatic approach. We did not automatically assume navigation was the only option. And, for restoration to navigation, taking into account the location constraints, the wildcard suggestion was to consider reconstruction the 18th century way i.e. by hand. With 'navvies' carrying buckets and pushing wheelbarrows. No big machines, no multi-million pound contracts to construction teams, little noise, no haul roads. In discussions with CCT this was usually dismissed as a joke but it would, if taken seriously, alleviate many of the problems. It would still last years of course but it would be a genuinely unique approach, and show real sensitivity, not just a bog-standard construction job.

That sort of thing, joke or not, could be very 'Stroud' - hugely interesting in heritage terms, non-disruptive and, able to sensitively cope with many (though not all) of the biodiversity issues. And with scope for a long-running volunteer programme, just the thing that attracts funding. The strategy does state that "were this to be harnessed correctly and sensitively, the area could inherit regional acclaim; akin to being an eastern partner-landscape to the WWT Slimbridge landscape in the west". The navvie approach would certainly get attention. These days it would inevitably be the subject of a long-running reality tv series. Which might or might not be a good thing, depending on your point of view.

Whether or not that approach would even be viable the point is that restoration itself is a major disruption and acknowledging that there are different ways of doing it is essential for any strategy. Novel approaches also attract, as pointed out above, novel funding, so are worth considering, scoping and pursuing.

Going back to the definitions of restoration, and the concept of partial restoration to linear park - possibly as a first phase on a project that might never get to final phase - I'm very aware that many within the canal lobby dismiss such suggestions out of hand. Most see navigation as the holy grail, the only option, and are immediately angered by a suggestion of anything less. But 'restoration' is a heritage term that is looser than 'let's get some boats through'. Ebley Mill was 'restored', but it's not a mill. As suggested above the boats approach may not be sustainable - and, if looked at honestly by SDC and found unlikely to sustainable after initial grant-aided capital spend, the responsible approach would be to go for a pared-down version and to disappoint the lobby. A pragmatic approach is always best. Their ambitions can be put on hold. It is worth recalling that Thames & Severn/Stroudwater has form in this respect, restored to navigable standard by a consortium of local authorities via a Trust in 1899 and closed as unviable a few decades later.

Is there actually an economic case for through navigation or would the social and economic benefits of 'restoration' be achievable by 'merely' making the unnavigable sections more accessible and safe but without navigation? Has anyone done that study? If not why not? The majority user, by a massive factor, is the towpath user. Boats are a tiny minority of visitor numbers, and the infrastructure needed to maintain their passage far outweighs the benefit they bring, and not just in financial terms. A linear water park is just as interesting to many, possible more so in some respects. The Tiverton Canal in Somerset is an interesting example, landlocked and with little traffic. The Tavistock Canal in Devon has no traffic at all. Boat passages from the Gloucester & Sharpness at Saul up the Cotswold line to Stroud and Brimscombe could have clear beneficial effects in social and economic terms locally but up and through the tunnel is a less compelling case economically. I recall a study of towpath users on the Leeds & Liverpool Canal some years back where they were asked what they understood about passing leisure boats and where they had come from. Basically the respondents didn't really care, and many didn't even seem to comprehend that the canal (even when they knew its name) did actually link Leeds and Liverpool. Boats, certainly through passages, simply

didn't matter to them, they just liked using the canal. That makes a case for having water in it, but not necessarily a case for working locks and bridges, merely a case for a long thin, not necessarily continuous, pond.

In the case of the Chalford - Sapperton section restoration to a linear water park might be far more feasible than restoration to through traffic, achieve most of the same local benefits (and perhaps add a few) for the towpath user, not compromise the biodiversity and cost a fraction of the conventional approach. There would, as an added benefit, be far fewer worries about water supply, arguably the biggest - and by far the least sustainable - issue for navigation on this section. And it leaves the tunnel untouched, another huge expense (and which also has biodiversity constraints).

In conclusion your consultation document format is unfit for purpose, the strategy should say more about restoration - and what it means for areas 9 and 10, acknowledging that restoration is itself development, that biodiversity is not automatically improved by restoration and that differing levels of 'restoration' exist.

I trust this is helpful.