

From: [REDACTED]
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To: _WEB_Canals Strategy

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To whom it may concern,

I share the Friends of the Frome ecologists perspective on the format and process of the 'Strategy' as a whole and the content as it relates to the canal corridor east of Brimscombe (in Stroud District) in particular. In my opinion the strategy also suffers from an initial weak brief, early missteps and unchallenged assumptions, none of which are DHUDs fault.

I think Canal Strategy materials developed by DHUD have merit in that:

- there is a consistent language and method suggesting cohesive strategy
- it is visually attractive and
- has the potential to be informative

but in its current form it is quite impenetrable to the lay person. It also has the sense of being the product of a generic toolkit. Aspects of spatial and other planning are of course timeless and universal but can be clumsy, impersonal and irrelevant without the sufficient inclusion of local knowledge, significant local engagement and observation.

Fortunately, to my knowledge, a lot of this local knowledge, engagement and observation for the corridor west of Brimscombe is captured in the The Cotswold Canals Connected Activity Plan. It is a detailed and robust document for a 10 mile stretch of the canal network (not just 'the missing mile' as suggested in the strategy brief), consisting 300 pages of research and development, activity planning and 12 budgeted action plans, underpinned by many qualitative and quantitative data sets, eight major research reports, methodology reports, pilot projects and case studies, this volume of work must be integrated in to the wider canal corridor strategic development. It represents £800,000 of investment and years of partnership and stakeholder working.

There is insufficient evidence of the full and thorough inclusion of this work as a whole in the Strategy and logically that level of local engagement hasn't taken place east of Brimscombe and isn't included in the strategy .

The plan calls up the CN2030 plan as reference and its presence is clear, however the central thrust and assumption of the canal strategy and the road show of the CCC and CCT touring communities is that connecting the canal as water way (from the Severn to Thames) is the most important purpose and value and trumps all others.

I disagree with this assumption in general and specifically in terms of the corridor length east of Brimscombe to the Sapperton Tunnel, both in terms of the context of the climate and ecological emergency, the application of the precautionary principle based on the current ecological evidence (presented by Friends of the Frome ecologists) and in terms of the opportunity cost of where the investment might otherwise be spent even if it is spent on heritage restoration.

In the context of climate and ecological emergency, ecological design principles (which serves the purposes of mitigating and adapting to that emergency) and community resilience should be the primary values for

decision making. The 'Environment' and 'Sustainability' should encompass an sustainable social (inc a socially resilient) environmental and economic approach. Therefore it isn't just an important afterthought or secondary decision making attribute or filter but the 1st one from which all other criteria follow.

Restoring the canal east of Brimscombe does not follow from this at all in my view and in fact I think it contradicts it. On the basis of the precautionary principle (supported by the ecological science and evidence based shared by Friends of the Frome ecologists) is already available to support this position in the context if a climate and ecological emergency

Whilst I note a restored canal is one rather buried bullet point in the sections relating to Chalford, we are told is many years off and contextually hard to do/ costly and of the lowest priority in terms of the wider Severn to Thames ambition, it is nonetheless there and I think it shouldn't be.

I propose Supplementary Planning Guidance should be issued that explicitly states that there is no case for a restored canal east of Brimscombe to Sapperton on the grounds I have outlined above.

Regards



Member for Chalford, Stroud District Council