



Dear Whomever it May Concern:

23<sup>rd</sup> May 2022

## Woodland Trust Response to the Draft Canals Strategy Consultation

The Woodland Trust (“the Trust”) is the UK’s leading woodland conservation charity and wants to see a UK that is rich in native woods and trees, for people and wildlife. We aim to achieve this by restoring and improving woodland biodiversity and increasing people’s understanding and enjoyment of woods and trees.

We own over 1,275 sites across the UK, including Northdown Wood at Bickleigh. In total our sites cover over 23,580 hectares and we have around 500,000 members and supporters. The Trust is recognised as a national authority on woods and trees and a protector of the benefits and values that they deliver for society.

We welcome the opportunity to comment on the above CONSULTATION.

Comments as follows:

### Drivers for Change

#### **Question 1:**

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

More could be made of climate change and the ecological emergency we are currently facing. These are pressing and immediate threats which should be seen as drivers for change to move to more sustainable travel, protect and enhance green corridors and deliver more sustainable places to live. However, I commend the Continuity: Nature driver, that development must have a fundamentally integrated approach to supporting nature.

### Canal Strategy Areas

#### **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?***

This relies largely on local knowledge. If the geography and sense of place have been considered effectively, the 14 areas will make sense to those living in this area. The maps are difficult to work with on screen and their size also makes them difficult to print off. It would be good if these could be produced at A4 size in future with font sizes which are easily legible.

**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?***

Although the ambition or recognition of what planting 6000 trees could do for nature is included, there is only a minor mention of the retention of existing trees and woodlands, as recommended in the National Planning Policy Framework, and the role that trees play in fixing carbon and their other ecosystem services.

Ingredients of the Future Place

**Question 4:**

***Do you agree with the ingredients in general terms? Are there other ingredients you would like to identify?***

I agree in general terms, although many of these ingredients will compete. For example, increased lighting and development along the canal is highly likely to impact biodiversity. I would recommend that the strategy delivers clear ambitions, selecting fewer key ingredients so that it can be an ambitious project doing what it sets out to do well.

***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?***

In line with the comments above, the ingredients should be prioritised so that clear actions for delivery of the strategy can be achieved.

Supplementary Planning Document

**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?***

**Yes**

***Would any changes to the canal strategy help to improve the delivery of Local Plan canal policy?***

The Woodland Trust is concerned about threats from development and disturbance to large areas of woodland including Ancient Woodland, in the Chalford and Eastern Upper Valley at the end of one of the canal areas within the strategy. We were unable to make a full assessment of the proposals due to the poor readability of the documents, but I hope that this and Table 1 below is of assistance. We urge the council to follow the guidance in paragraph 180 (c) of the National Planning Policy Framework, regarding the protection of irreplaceable habitats, including Ancient Woodland.

Please do not hesitate to get in touch with me should you wish to discuss my response further.

**Yours faithfully**



**Regional External Affairs Officer, The Woodland Trust**

**Table 1 Assessment of Canal Strategy Areas for Ancient Woodland and significant trees**

Canal Strategy Areas No.	Canal Strategy Area	Map in Document B	AW or significant trees affected?	Details of AW and/or significant trees affected
<i>Gloucester &amp; Sharpness Canal Strategy Areas</i>				
1	Upper Gloucester & Sharpness	Page 6	No AW within strategy area, or 300 m beyond  2 trees close to canal side	Pendunculate oaks: veteran (ID 12809) and ancient (ID 3327)
2	Saul & Frampton	Page 7	No AW within strategy area, or 500 m beyond  No significant trees	
3	Lower Gloucester & Sharpness	Page 8	No AW within strategy area, or 500 m beyond  4 trees by canal side	3 veteran trees all willow (IDs: 146829,146830, 146831) 1 notable tree hybrid black poplar (ID 25401)
4	Sharpness	Page 9	No AW within strategy area, or 500m beyond  4 trees in area 3 on map close to canal basin	3 veteran trees all pendunculate oak (IDs: 113469, 113471, 113473) 1 notable tree horse chestnut (ID: 113704)

*Stroudwater Navigation / Thames & Severn Canal Strategy Areas*

1	Western Stroudwater	Page 10	No AW within strategy area, or at least 500 m beyond  1 tree close to (disused) canal side	Veteran tree Sessile Oak (ID 27896)
2	Easington	Page 11	No AW within strategy area, or at least 500 m beyond  No significant trees in strategy areas  <i>BUT canal borders Easington Park - indicated as Woodpasture and Parkland BAP</i>	
3	Stonehouse	Page 12	No AW within strategy area, or at least 500 m beyond  No significant trees in strategy area	

4	Ryeford	Page 13	No AW within strategy area, or at least 500 m beyond  No significant trees in strategy area	
5	Ebley	Page 14	No AW within strategy area, or at least 500 m beyond  No significant trees in strategy area	
6	Stroud	Page 15	No AW within strategy area, or at least 500 m beyond  No significant trees in strategy area	
7	Thrupp	Page 16	No AW within strategy area, or at least 300 m beyond canal side  No significant trees in strategy area	
8	Brimscombe	Page 17	No AW within strategy area, or at least 500 m beyond canal side	

			No significant trees in strategy area	
9	Chalford	Page 18	2 areas of AW are within or close to the strategy area  No significant trees in strategy area	Hyde House Wood (ASNW) SO88380204 (2.8Ha) is < 100 m from riverside and is part of Mary Hill area noted on map to the west  Cowcombe Wood (ASNW) SO89640221 (14.9Ha) is close to Cowcombe Hill towards the east of the map is < 100 m from river although this is across road and railway line
10	Eastern Upper Valley		7 areas of AW are within or close to the strategy area  No significant trees in strategy area	Pontins Farm Wood (ASNW) SO90890285 (17.8Ha) is 60 m from canal but across a road.  Westey Wood (ASNW) SO91180271 (3.5 Ha) is 60 m from canal but across road and railway line.  Tanners Wood (ASNW) SO92560310 (5.11 Ha) is adjacent to the canal.  Sapperton Common Wood (ASNW) SO93050309 (32.95 Ha) is adjacent to the canal.

				<p>Sapperton Common Wood (ASNW) SO93490301 (35.85 Ha) is adjacent to the river Frome which is close to the canal.</p> <p>The above woods take you to Daneway which looks as if it is the end of the canal. The strategy area extends beyond this some way around the River Frome.</p> <p>Dorvel Wood/Course Copse (ASNW) (92.6 Ha) borders the River Frome</p>
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