

Consultation on proposed Stroud Canals Strategy

Suggestions for public responses; deadline 27th May

To see the strategy documents go to SDC: [Proposed Canals Strategy for Stroud District | Stroud District Council](#)

Stroud District Council intends to deliver this long term vision and strategy for the future use of the canals within the District as part of its planning policy. The Strategy will then be used to guide prospective developers about the potential for future development of the canal corridor, including adjacent brownfield sites. It presupposes the restoration of the entire canals system, the latter of which is also embedded in the Council's specific Delivery Policy on Canal Restoration.

Whilst the restoration of the stretch between Chalford and Sapperton may be some way off, this Strategy, if adopted, will provide potential developers (including canal restorers) support for a direction with which we profoundly disagree. Here, our Vision is for a river and canal network teeming with wildlife, celebrated by people for both their wellbeing and nature itself.

If, like us, you think that this Strategy is not appropriate for the canal stretch between Chalford and Sapperton, please respond. The following are bullet-pointed suggestions for angles you might choose to take. Perhaps you could use them as a basis to describe in your own words what wows you about this wonderful stretch of canal, why it is important to you, and why this Strategy fails. Thank you!

Further questions email: ████@friendsofthefrome.org.uk

1. The unfathomable presentation of the Draft Strategy

It took us many days to get to grips with the Strategy as it is presented and formulated.

Presentation of the documents and other material

- In its current format the Draft Strategy is almost incomprehensible. It 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. The wall chart (A) would need to be printed at A1 size to be readable.
- The annotated plans are complicated and difficult to interpret and can only clearly read if the document is printed at wall chart size. However not many people would have access to printers with this capacity.

- For the same reason, the writing is impossibly small (approximately 1mm tall) to read and cannot be read on a computer screen.
- The documents are full of acronyms, which far from assisting communication, make it difficult to understand the contents.
- Given the size that is needed to print Documents A and B, it is hard to locate the keys to the acronyms and the colour codes which makes interpreting the annotated plans almost impossible.
- In its current form, the Draft Strategy is incomprehensible and therefore not fit for presentation to the public for comment. the purpose for which it is designed which is that of elucidating the strategy for restoring Stroud's canals.
- Where is the Vision? There is no written Vision statement accompanying this Strategy. (Maybe state your own Vision).

Terminology

- The documents contain statements or terminology that are misleading and confusing, for example Chalford is described as offering a 'village green' destination!
- The difficulty in understanding the terminology of the Draft Strategy, and the fact that is presented just as charts and diagrams makes it highly likely that the public's response to the strategy will be very low. The consultation response is therefore unlikely to reflect a full response from many who view these nature-rich stretches as extremely valuable both intrinsically and for the benefits they offer to their mental and physical health and wellbeing.
- In its current form the Draft Strategy is an example of 'green washing' in which proposals which will be detrimental to nature are cleverly obscured within complicated diagrams, unusual terminology, a multitude of acronyms and the strategy's verbose nature.

Biodiversity and nature must be represented as a key Driver

- Whilst the Stroud Valleys is a stronghold for biodiversity and nature (even in semi-rural and more urban areas) nowhere in the Draft Strategy is Biodiversity identified as a key Driver. Biodiversity is simply subsumed under a smorgasbord of so-called 'Ingredients' (minor options) from which to choose. This is not acceptable.
- The Draft Strategy gives the impression of being a 'green' strategy in which potential benefits to nature and the environment are described. In reality however this is 'green-washing'. The restoration of the rural canal will be another form of urban development and one that we think will inevitably result in losses to wildlife and remove opportunities for climate change amelioration.

Conclusions

- All these factors make the Draft Strategy exceedingly difficult for the layperson to interpret. In our letter to Stroud District Council, we describe this as 'like trying to learn a complicated board game with rules that are inadequately explained!'. Stroud District Council does provide additional material in form of a statement and a video, but unfortunately these say little and do nothing to make this complex document more reader friendly.
- The Strategy appears to have been written for those with training in planning or landscape design not for the lay person this. We believe that the strategy as presented is impenetrable and misleading, the wall chart shows cartoon like drawings of wildlife, but Biodiversity is neither addressed as a key Driver of this Strategy nor even as an Opportunity. Mostly Biodiversity is regarded as a constraint-

2. We should celebrate and build on the nature that is already present

Current state of the disused canal between Brimscombe / Chalford and Sapperton

- Stretches of canal east of Brimscombe extending through Chalford and Sapperton are rich in wildlife species and are associated with a wide diversity of habitats including aquatic vegetation, woodland ground flora, scrub, tree lines, mature trees, reed beds, hedgerow, deadwood, standing and prone, often in the channel.
- In its current format the Draft Strategy does not recognise the value of the nature-rich areas associated with the canal east of Brimscombe Port. Nor does it acknowledge the difference between the wilder stretches of the canal in these more rural settings and the stretches through more urban areas.
- This stretch of canal, which has been derelict for 90 years, has been 'managed' by nature resulting in the creation in a unique nature-rich site.
- Wildlife is abundant and the associated habitats are well established.
- The disused canal in its current state supports a wide range of species many of which are in local or national decline.
- Between Chalford and Sapperton the lack of management has resulted in a wilder type of habitat which is getting increasingly scarce in the landscape.
- Restoration of the canal in this section will mean more concrete, grey-space and manicured areas i.e. it will be urbanised. Urbanisation is recognised as a significant pressure impacting upon nature and habitats and has been identified as one the causes responsible for the loss of nature in the UK where the majority of the landscape has been modified by humans (State of Nature Report 2011).
- Evidence is not provided in the Strategy about the known high-nature value areas between Chalford and Sapperton. Not enough consideration has been given to the existing biodiversity.

- The disused canal is a tranquil, beautiful, nature-rich environment. This should be seen as a cause for celebration. Walking along the canal and river makes us feel good.

3. To restore the canal or not? Potential impacts of restoration

- Huge destructive impacts on nature relating to the restoration of these highly sensitive stretches of the canal are anticipated. Construction of site compounds and a haulage road, to transport machinery and materials, will be required. To allow for this construction most of the vegetation on the tow path and the canal and riverside vegetation will need to be removed this will impact both on the habitats associated with the canal and the sensitive riparian habitats. Work is anticipated to take years and the damaging impacts on nature will extend far into the future.
- Restoration will involve removal of aquatic vegetation and deadwood (an increasingly rare habitat type) in the channel which provide refuging and foraging habitat to numerous fish, amphibian and invertebrate species, these in turn provide food for birds and bats associated with the canal and for otters which have now become a regular sight along the waterway, removal of aquatic vegetation would also impact on water voles (and other small herbivorous mammals) which may be present.
- The UK is one of the most nature depleted countries in the world – with 41% of UK species having declined since the 1970s. We believe that canal restoration in the rural area between Chalford and Sapperton will contribute to further losses.
- Trees, many of which are of a considerable size with veteran features, providing suitable roosting and nesting habitat for bats and birds, will need to be removed if the canal is restored.
- Trees and woody debris in the channel which currently provided foraging and sheltering habitat for invertebrates and fish, breeding sites for amphibians and birds, and sheltering opportunities for otters will need to be taken out of the channel to allow boats to move freely up and down the canal.
- Scrub and ground flora along the canal will need to be removed – this is an additional loss of habitat with adverse impacts on wildlife.
- The canal at present is a carbon sink. The carbon cost of restoration of this stretch is not considered.
- Restoration of the canal through Chalford and Sapperton would result in the creation of a much more urban environment. It is far better to embrace the current condition of the canal and celebrate the diversity and abundance associated with these stretches and the rich mosaic of existing habitats.
- A considerable extent of the UK's landscape has been modified and damaged as a consequence of urban development. In places where there is high economic or social need, then loss of natural environments is inevitable and the protection of nature may take second place to economic and/or social regeneration. However, this is not

the case in Chalford or Sapperton where the canal environment is enjoyed by multiple users, many of which visit to enjoy the wildlife associated with it.

- The unrestored stretches of the canal offer many visitors the opportunity to connect with nature and a chance to enjoy the beauty and tranquillity of this wilder stretch of the Thames and Severn canal.
- Rather than restoring the canal east of Brimscombe to its original condition, this nature-rich stretch offers an opportunity to highlight the myriad of opportunities offered to wildlife when nature is left alone to manage itself.
- This stretch of canal could be used to illustrate how biodiversity is enhanced when humans let go of their cossetted desire to 'tidy up' nature.
- Leaving the nature-rich stretches of canal free from restoration provides a visual representation of the stages in the life of the canal and contributes to the canal's heritage.
- The current nature value of the canal east of Brimscombe has not been highlighted appropriately in the Draft Strategy. The differences between the wildlife rich stretch that extends through Chalford to Sapperton and the nature impoverished urban stretches, where development may be more appropriate are not recognised.
- The Draft Strategy says it wants to connect people with nature. However, restoration and development of sensitive nature-rich stretches along the canal between Chalford and Sapperton will deny visitors, who love wildlife and find solace in nature, the opportunity to truly connect with nature in a wilder natural environment. Development in these areas is likely to result in a greater severance from nature.
- Maintaining the stretches of the canal that have become wilder in nature in their current condition, rather than restoring them to a more urban condition, will help to reverse some of the local and national declines in wildlife species that are currently being witnessed.
- There is a prevailing trend to 'tidy up' nature which often results in an associated loss of wildlife, these more nature sensitive and biodiverse stretches of the canal should be protected and celebrated in their 'untidy' condition and seen as an example of how nature can flourish when left alone.
- These disused stretches of the canal currently support a diverse assemblage of wildlife and a mosaic of habitats and there are numerous opportunities for habitat creation and enhancement which could bring additional nature benefits to these stretches of canal.

4. Legislation & Policy

Stroud District Council Local Plan Delivery Policy

- The existing biodiversity value and importance of the canal and river in the Frome valley has been underestimated in the Draft Strategy and is at odds with Stroud District Councils Local Plan 'delivery policy' ES6 which addresses biodiversity. ES6

states 'The council will support development that enhances existing sites and features of nature conservation value (including wildlife corridors...), ...and that all developments will enable and not reduce species ability to move through the environment in response to predicted environment change, and to prevent isolation of significant populations of species'.

- We believe that the proposals outlined in the Draft Strategy will drive biodiversity downwards not enhance it, consequently they contravene District, County and National nature conservation legislation and policy.

The Environment Act

- In the Environment Act 2021 the government outlined its mission to 'halt the overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological network', this mission statement is not embraced in the Draft Strategy which if implemented would result in the loss of species and habitats associated with the stretches of canal that extend through Chalford and Sapperton. This would be an unacceptable biodiversity loss.
- The Draft Strategy fails to acknowledge the Gloucestershire Nature Recovery Network. This mapping project, continually updated, uses algorithms to locate opportunities for creating a more resilient network of habitats for people and nature. This mapping project identifies very high quality 'core habitat' and shows where habitat networks can be optimally located. One of these Core Areas includes the Chalford to Sapperton canal corridor. It is
- The Environment Act 2021 contains provisions for the protection and improvement of the environment, including biodiversity net gain (BNG), the latter is an existing policy requirement in the National Planning Policy Framework which Stroud District Council is required to implement. The Environment Act mandates this requirement. The objective of BNG requires the biodiversity value attributable to a development to exceed pre-development biodiversity values by at least 10%. With its current high biodiversity value, we believe it would be impossible to deliver the governments' mandatory biodiversity value in relation to the development of the areas of high nature value associated with the canal in Chalford and Sapperton. The only way offsite compensatory habitat of sufficient biodiversity value could be created would be to construct an adjacent canal and leave it to rewild itself for a century!

Nature Recovery

- There are numerous local and national initiatives currently in place to attempt to restore nature and slow down the current declines in wildlife abundance and diversity. These initiatives aim to implement and embrace the Lawton's principle, outlined in Making Space For Nature: A Review of England's Wildlife Sites (2010), of creating 'bigger, better more joined up' nature sites. Restoration of the sensitive areas of the canal is at odds with the objectives outlined in the review.

- The Draft Strategy does not acknowledge the government's Nature Recovery Network (NRN) which aims to restore and enhance England's wildlife-rich places. Locally this is implemented by the Gloucestershire Nature Recovery Network. This mapping project, continually updated, locates opportunities for creating a more resilient network of habitats for people and nature. It has identified very high quality 'core habitat', on which nature recovery can be built and including the Chalford to Sapperton canal corridor. Why is this nature strategy not incorporated into the Draft Stroud Canals Strategy?
- Another NRN aim is to 'improve the landscape's resilience to climate change' restoration of the canal will result in the loss of huge amount of vegetation, both terrestrial and aquatic, this is not only detrimental to wildlife but will also be detrimental to the environment as a consequence of the loss of plant material and its associated climate change ameliorating functionality.

5. Physical and mental health and wellbeing

- There is considerable scientific evidence that being in nature has a profound impact on our brains and our behaviour, helping us to reduce anxiety, brooding and stress, and increase our attention capacity, creativity and our ability to connect with nature' www.mind.org.uk. Spending time in wild environments is good for us!
- Our relationship with nature is critical in maintaining good mental health and reducing stress www.mentalhealth.org.uk
- Nature and our connection with it played an important role in our ability to cope with the pandemic.
- There is a huge amount of evidence to show that we are happier, calmer, more joyful and creative when we are connected to nature and high-quality nature spaces are most likely to help support good mental health. We believe that the restoration of the stretches of canal associated with Chalford and Sapperton will result in much a less natural environment, and that elements which provide us with the most health benefits may no longer exist.
- 'We love to walk along this quiet stretch of canal – it makes us feel good!'