

Thank you for consulting the Canal & River Trust on the proposed Canal Strategy. The additional video explaining how to use the document and its aims and the improvements to the maps and keys in document b are very much welcomed.

General comments

The Canal & River Trust agree with the ambitions of the strategy, and they align with the Trust's aims for wellbeing, engagement, and visitor experience.

The strategy focusses quite heavily on the Cotswold canals, as does the local plan and policy ES 11. The Trust have been recommending that the benefits already brought to the district by the existing canal and which can be delivered as part of the Cotswold Canal restoration be better recognised, and so creation of the Canal strategy and the inclusion of the Gloucester & Sharpness canal is very welcome.

However, the document fails to make users aware of the different ownership and management of the Gloucester & Sharpness canal and thus the potential for differences in constraints and opportunities and the need to work collaboratively.

The Trust has its own national in-house guidance, design documents & strategies and so any aspirations for the Trust owned canals will be expected to adhere to these. It is suggested that close collaboration is needed between the strategy group and the Canal & River Trust to understand our aspirations and constraints as the owner of such a substantial asset.

The strategy does not recognise challenges and constraints, although it is recognised that it is purely aspirational. But there are ideas within the strategy e.g. additional canal crossings, or new facilities along our canal, which we feel very strongly should have been discussed with the Trust before the publication of the strategy. Proper consideration of the impact of them on our land, resources, existing structures, use of the canal as a commercial waterway and our national aims and policies need recognition.

There is some acknowledgement of the requirement for facilities / impact of the lack of them, but this would need to be more carefully considered in areas where there is a desire to increase visitation. Similarly, other practical elements such as littering and managing the relationship between different towpath users requires closer attention in some locations and the survey work done as part of this strategy will be of use to the Trust.

All the canals across Stroud should be improved for active travel especially given the Governments drive towards sustainable transport and taking cars off the road (reducing carbon). £1.5 million already spent in last three years in Gloucester to create a significant sustainable travel corridor out from the centre of Gloucester to the southern boundary of the city (Sellars Bridge, Hardwicke) – approx. 6km. This multi-user route is now very well used and should be seen as a pilot for the canals across Gloucestershire.

The improvements should be continued across the entire network in Gloucestershire providing a practical, safe, sustainable off-road travel route choice connecting Stroud, Gloucester, and Sharpness in line with Government aspirations (LTN 1/20). These improvements, however, should not be at the loss of the unique character that canals provide, or impact on other users or aspirations, so any improvements must respect the canals unique character and be designed to be safe in line with the sections already improved. The Stroudwater and Gloucester & Sharpness canal may not necessarily be the most direct route between Stroud and Gloucester but being a safe green corridor largely away from traffic means it provides so much more in terms of the wider health, fitness, wellbeing, and place making agendas. A choice between cycling along a busy road

(with high pollution levels) or the green canal corridor – either as a route for commuting, or, for pleasure?

The document does not consider educational opportunities or social / participation (i.e., volunteering) in enough detail, and this type of activity can improve health and wellbeing throughout the district.

The documents

The two videos help in understanding both the strategy and how to use it, and the website now makes it clearer that these videos should be watched prior to opening the other documents. Is this information available in other formats to make it accessible to all? There is still a concern however that the documents themselves in isolation and not capable of being properly understood by users, and not all users will be able to watch the video.

Document A

There is a lot of information on the wall chart. The volume of information makes the chart overly busy, not user friendly and very difficult to view on a screen. The format may render it particularly difficult for some users.

The Canal Orientation is wrong in several plans, which is confusing to users, perhaps a revision to the orientation of the document would help? If this is not possible at least a north arrow should be included to identify the correct orientation.

The title of the documents 'Stroud canals' could lead users to believe the canals are all owned and managed by SDC. Should this be 'Canals within the Stroud District'? none of the documents make it clear that there is a difference in ownership between the various canals. This has an impact on what can be achieved and delivered, as other partners may not have the same aspirations or priorities, and this seems to have been forgotten.

The canals cross Local Authority boundaries but this is not recognised, nor is the need to cross boundary working, aspirations and treatment. The Cotswold canal restoration is part of a bigger project, running beyond stroud and including other canals which could in the future create new cruising ring.

Document B

It is still felt that the document needs its own written introduction covering ideas from the video. Not everyone can or will access the video first. Without an introduction it is a very confusing document, and it is not clear what it is setting out to achieve. The introduction should put the document and strategy in context, introduce the action plan concept sooner to make it clear that this document is not a policy or action plan, and that more work needs to be done with various stakeholders. Signposting and cross referencing is needed between the other documents and the evidence base and a reminder of the need to watch the video (if available) should be included to allow document b to make more sense if initially considered in isolation.

P2. N point -ownership details – add owned and maintained by the Canal & River Trust under the banner, or mark difference in ownership in another way in the key.

P3 no explanation of what this is or how used. Some form of introduction explaining the methodology for ranking is needed or a pointer to the background information would be useful.

P4 assumption that people understand that this links to page 3. No signposting, no explanation.

P5 why is this here? No explanation of why this work done, how it fits and has been/will be used and its methodology etc is several pages later.

P6 thank you for providing the key immediately before the maps rather than having to refer to a different document. This makes the subsequent plans easier to use. The maps are improved by the addition of place names and a clearer background to allow users to properly understand locations. The correction to the key helps understand what the plans are trying to show.

Appendix

There is no mention of there being an appendix in the document or near the carbon reduction plan which needs a link to the information in the appendix.

Evidence document- G1 the Canal & River Trust

Cross referencing to other sections of the Canal & River Trust website and the Town & Country Planning Association Policy advise note might be helpful. The PAN has sections which are out of date (and there is more up to date pages on the Canal & River Trust website which give wider information on design and placemaking), however it remains useful as a 'one stop shop for the Trusts aspirations. Alternatively, several links to different sections of the website could be provided or a link to the whole website rather.

Please note the 'and' in our title should be an ampersand- Canal & River Trust.

P116

Mentions of the east-west link across the district and the need for crossings over the link north to south. Due to the orientation of the various canals this only relates to the Cotswold canals.

Branding The Canal & River Trust has its own branding, style and voice which is used throughout any canal owned and maintained by the Trust. Further discussions are needed if it is considered the same branding is needed on all the canals within the district.

P117 Linkages may be a better term and concept than crossing? linkage implies not just crossing the canal but linking it to its surrounding areas and bring users along not just over the canal.

Question 1

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

Crossings, better idea might be linkages. Crossing implies a bridge over the canal, and the document suggests a new bridge over the Gloucester & Sharpness canal that , without further investigation may not be acceptable. Linkages bring people to the canal from beyond the immediate area and can guide towards nearest crossing point.

New canal crossings create many issues, such as funding and long-term maintenance as well as other issues such as the impact on navigation and navigational safety. Licenses from the Trust and DEFRA consent are also necessary. The Trust is concerned that the document may raise aspirations due to the lack of apparent understanding and recognition of the differences between ownership and use of the different canals. The Gloucester & Sharpness canal is a commercial waterway and as such has different requirements than other waterways, any new crossing must allow access for freight as a moveable structure may create additional on-going costs. The Trust has detailed guidance on the design and location of bridges and would be happy to share this with the Council.

Continuity may not be the best term to use, would it not be more appropriate to use the term connectivity which is the term the Canal & River Trust tend to use?

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?

Yes, breakdown of areas on the Gloucester & Sharpness Canal seems sensible, and the identified areas do have differing characteristics, although some characteristics are the same throughout, due to the linear nature of the canal.

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?

The Trust agrees with principle of the place making framework.

Carbon reduction – freight and using canal water for heating and cooling opportunities as well as Hydroelectric power for all canal areas.

Question 4

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

The Trust agrees in general terms with the list of ingredients, indeed many of these closely follow our own guidance and aspirations.

Upper G & S

There is the suggestion of a new footbridge at Sellars (Upper G&S) - the map does not indicate distance from neighbouring bridges or an exact location, which would be useful to allow us to consider this. An additional crossing could benefit walkers, but is there evidenced demand for it, what are the longer-term maintenance implications etc.?

Lower G & S

Constraints exist around the Purton Hulks, and this needs to be understood and factored in.

Sharpness

The site provides great opportunities for leisure / recreation, environment / heritage - history, business growth, residential growth, and all around as a more vibrant visitor hub but aspirations need to be realistic and consider known constraints.

There is no acknowledgement of the site allocation for development at Sharpness or any attempt to build this into the strategy. The proposals for the redevelopment at Sharpness address very specific environmental issues and there are significant constraints over for example visitor numbers which will directly impact on what can be achieved at Sharpness. These extend to the need to avoid large increases in use of the towpath as well as access to it to manage public contact with the estuary and in particular birds living there. This is not recognised by the strategy. numbers at the site itself are further limited by the Hazardous Substances Consent at the docks.

The strategy document does not appear to have reviewed these constraints and looks at access through what it described as green area, which are in fact to be the location of 300 homes and has included a new canal crossing which does not form any part of the development proposed and which could raise environmental issues.

Any recommendations need to be routed in the site-specific issues and constraints to create a realistic and deliverable set of proposals. Unfortunately, the document as currently drafted appears not to understand the Council's own objectives for Sharpness or the constraints in the area. As an example, the Trust has been required to demonstrate that the development would not increase use

of the towpath and disturbance on breeding birds or facilitate predation by pets through identifying walking routes in the area away from the estuary as well as management payments.

Whilst some of these things are more related to the later Action Plan the document does need to at least recognise the environment designations and the challenges which affect Sharpness at this stage to be an accurate representation of the current situation.

It is suggested that the authors of the study meet with the Trust to properly understand the Sharpness area, its constraints, what may be achievable and what we, the trust as owners of the site and canal are aiming to promote, bearing in mind that the District Council do not own this canal.

Timings

In all Gloucester & Sharpness canal areas improvements may tend to be a mix of opportunistic and reactive as other funding opportunities and nearby development generate the ability to deliver some improvement. As an example, the £1.5 million of towpath improvement work to beyond the district was funded by a mix of CIL, S106, and Gloucester Environmental Trust and ERDF. This opportunity came about due to partnership working between The Trust and the County and Gloucester City council. It must be made clearer that any timings are entirely flexible. Any priorities for this area need to reflect the Trusts own priorities, which will also change through time.

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

This should have been the first question? There needs to be reference within the written strategy to the policy and more information on how it will be used to support delivery of its aims throughout. The document should be used as evidence /guidance to support the local plan policy but perhaps not referred to as design guidance?