



27 May 2022

Dear Sir / Madam

I am writing in response to the Stroud District Council consultation on the Draft Canal Strategy.

### **Accessibility of the consultation documents**

Having spent over six hours wading through the online documents, whilst I can see that the strategy (summary wallchart) and supporting documents are very thorough, they are also difficult to absorb and comprehend.

After cross-referencing, transcribing numbers across different timelines for two draft Key Areas, 'SW&T&S 9': Chalford and 'SW&T&S 10': Eastern Upper Valley, zooming in and out of the enormous image, I believe the strategy needs to have an easy access PDF summary, with a table for all proposals for each of the Key Areas, Ingredients and timelines.

In its current state, with images of beautiful and bountiful wildlife pictures, I feel the wallchart provides plenty of green-washing, presenting an environmentally responsible image whilst the actual potential outcome from any canal development in Key Areas 9 & 10 is in fact the polar opposite.

### **"Phase 3"**

**I object to the terminology "Phase 3"** (see Document B, page 2 diagram). This is a Cotswold Canal Trust lobbying plan term which is locally opposed, and should not be reflected in Stroud District Council's Canal Strategy.

### **Continuity**

#### **The Key Driver for 'Continuity' requires a distinct principle based on nature**

As a priority, we need to **ensure the draft canal strategy adopts an ecological priority for the areas of Chalford and the Eastern Upper Valley**, particularly when the canal strategy will be used as design guidance for the delivery of Local Plan Deliver Policy ES11.

**Language already used within the strategy needs to be highlighted as a Key Principle:** "The canal achieves its full potential as a continuous wildlife corridor, wildlife barriers are addressed and new development must have a fundamentally integrated approach to supporting nature."

Whilst I feel hopeful that there are a few environmental measures listed in the draft strategy e.g. 'hands-off balance to land management', which in practice should protect the Frome Valley area, the Council needs to absolutely and specifically outline how each measure will be achieved, and held to account to do exactly that.

In addition to 'DHUD – place making, regeneration, urban design'; and 'Hilton Barnfield Architects' both listed on the wallchart summary, there should be clear partnership with local ecology and biodiversity experts.

**I object to the first Continuity Key Principle, which refers to a 'Functioning canal':** This could be understood as one you can drive a barge along, rather than a 'functioning and varied ecosystem'.

Throughout the draft strategy, there is an underlying assumption that the canal is restored to a navigable state "with a linked corridor from east to west as a foundation for a functioning canal for the whole district" – beyond the Brimscombe Port.

Stroud District Council's draft Canal Strategy needs to define 'functioning canal': Is this a fully navigable channel for motorised boat, pedestrian, cycling access? Is this creating a modern canal structure with a concrete base and impenetrable steel edges? Is this bringing in heavy machinery for construction and destruction in this delicate, remote habitat?

Phase 1B has connected the Cotswold Canals to the national canal network, making Stroud and Stonehouse canal towns once again in the Phase 1 and Phase 2 urban and urban/rural areas of the Five Valleys. Let's be proud of that, and all the community action and support involved. But the restoration to continue further East, to connect England's two rivers – the Severn and the Thames is nonsensical: Destructive. Expensive. Ultimately needless. And at the cost of the most beautiful, tranquil, wild eco-systems, with thriving wildlife, immense biodiversity.

For the sake of the extensive biodiversity, existing habitats, and tranquillity of this rural area, nestled deep within the AONB and Conservation Area and surrounded by nature reserves, Stroud District Council needs protect and preserve the existing wilderness.

We need to absolutely and categorically rule out canal-building for water transport or water transfer, as it would be highly destructive to the incredible ecology of the interlinked canal and River Frome ecosystem.

We also need to protect the architectural heritage, not just from the ill-fated canal, but the mills and other constructions dating back to the Domesday Book in 1086<sup>1</sup>.

### **Crossings**

**I object to the Crossings paragraph 'Unlike the Roads, the River and the Railway, the canal can become a public space':** In the Eastern Upper Valley section, and elsewhere, the River Frome is inseparable from the Canal - crossing, merging and splitting multiple times, providing a unique ecological and industrial landscape dating to the Domesday Book and beyond.

### **Clustering**

**I object to the weakness of the ecological aspect to the layered principles.** A team of ecologists need to be engaged alongside the architects who have worked on this Strategy with Stroud District Council to propose an eco-clustering principle.

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<sup>1</sup> [River Frome, Stroud - Wikipedia](#)

## Environmental impact

My overriding concern is one of needless destructive development along the stretch of canal from the Brimscombe Port to Sapperton Tunnel, specifically the latter reaches from Chalford to Sapperton.

Unlike the canal currently under development up to Brimscombe Port, these areas are not urban, or rural in a sparse setting, but significantly rural.

I write this response on the day that “the latest Red List for British butterflies shows a worsening picture for many species as climate change and nitrogen pollution pile on the pressure for insects already struggling with changes to landscapes”,<sup>2</sup> with more than two-fifths of British butterflies threatened with extinction. Whilst climate change will be a factor, experts believe that changes in land use are the main problem. Butterflies can’t be the only species under threat.

I write this on a day in the midst of a climate emergency<sup>3</sup>, where human activities have been identified as the main cause (IPCC); when the UN Environmental Programme lists “**One-third of the mitigation efforts needed in the next decade could be delivered by conserving and restoring nature. Conserving and restoring natural spaces, both on land and in the water, is essential for limiting carbon emissions and adapting to the climate emergency.** It would also improve rural livelihoods, build resilience and support COVID-19 recovery. Nature-based solutions offer cost-effective ways to tackle the triple planetary crises of climate change, biodiversity loss and pollution.” The UN’s Sustainable Development Goal ‘Life on Land’ states we need to “**Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss.**”

I write this on a day when Rewilding is an active movement in the UK - featuring in and even winning Best in Show at the Chelsea Garden Show this week.<sup>4</sup> Rewilding Britain state wanting to see “rewilding flourishing across Britain, reconnecting us with the natural world, sustaining communities and tackling the species extinction crisis and climate emergency. **We want to live in a world where we face up to the scale of destruction we’re heaping on this Earth, put an end to further degradation and start to recover what we’ve lost.** ... We all understand that we’re part of nature and not separate from it, that we can only thrive if nature thrives. Rewilding re-establishes natural processes and allows them to lead the way, free from set outcomes and fixed end points. It encourages the return of threatened and missing species and embraces the ebb and flow of nature, allowing animals, plants, birds and the elements to shape our landscapes and habitats over time. Acceptance over dominance is vital in the world we want to see.”

**In summary: “They paved paradise. Put up a parking lot.” Joni Mitchel, 1970.**

I am not anti-canal building. In the right place, the regeneration can do exactly the right thing.

Key Areas 9 and 10 are not the right place.

A restored canal through the Frome Valley from Chalford to Sapperton would not only be staggeringly expensive at a time where there are far greater priorities for the Council and indeed Lottery funding, but also exceptionally destructive and ecologically damaging. There is no justification for any development and destruction along this stretch of wilderness.

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<sup>2</sup> [Two-fifths of British butterflies threatened with extinction, analysis shows | The Independent](#)

<sup>3</sup> [Facts about the climate emergency | UNEP - UN Environment Programme](#)

<sup>4</sup> [The world we want to see | Rewilding Britain](#)

Yours sincerely

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