Planning Strategy, Stroud District Council, Ebley Mill, Ebley Wharf, Stroud GL5 4UB.



Stroud Valleys Project 8 Threadneedle Street Stroud, Gloucestershire GL5 1AF



Dear Sir/Madam,

I am writing to provide the Stroud Valleys Project's (SVP) response to the Stroud Canals Vision and Strategy consultation.

SVP is focusing its response on the areas known as Phase 1a and 1b as defined by the Cotswold Canals Connected (CCC) plan; however, SVP strongly opposes any proposals to restore a navigable canal east of Brimscombe (Phase 3) where restoration work would lead to significant habitat loss and damage to the wildlife that has taken over the corridor.

Before we begin our response to the content of the document, we'd like to comment on the format and accessibility of the consultation. SVP believes that many members of the public will have found it exceptionally hard to interpret the strategy documents, which are difficult to access due to a very small font; when the consultation is printed out and when viewed on a computer screen, it requires the user to scroll repeatedly across a large document. The explanatory text uses planning jargon which may be unknown to the lay person, making it very difficult to interpret and understand the strategy. It is likely therefore that many people who would like to respond to the strategy will have given up without responding and indeed, we have heard anecdotally that this is the case.

In terms of the actual content, SVP has the following concerns about the strategy:

- Improving green infrastructure and biodiversity appear as aspects of continuity and clustering, but SVP believes that these should be drivers for change in their own right, as part of SDCs Master Plan for responding to the current 'climate and ecological emergency' [Our Master Plan | Stroud District Council]
- The boundaries of the phase 1a and 1b projects to restore the canal do not match with the strategy areas, falling in the middle of the Brimscombe and Stonehouse strategy areas respectively. It is difficult to have a coherent strategy for an area where the restoration level of the canal is significantly different in two halves of the area; it would be easier to plan (and clearer for those being consulted) if the strategy areas matched the phase 1a and 1b boundaries
- There is a lack of consistency and continuity across all the strategy areas in the green infrastructure / biodiversity improvements described in the strategy
- There is no reference to the Gloucestershire Nature Recovery Network [Nature Recovery Network | Gloucestershire LNP (gloucestershirenature.org.uk)] data or plans
- The use of planning jargon means that the actual specifics of planned improvements are not described and are therefore difficult to respond to
- There are no measurable targets for any green infrastructure or biodiversity improvements

SVP recommends the following:

- A coherent biodiversity strategy for the whole of phase 1 (a and b) guided by the Local Nature Recovery Strategy, with
 - o Measurable plans for habitat creation, management and monitoring
 - Identification of key species
- A refocusing of the strategy with biodiversity and fighting climate change as drivers rather than elements of the improvements
- A bridge and signage at Capel's Mill

The canal path at Capel's Mill is a well-used route, but many people who are following the path become confused there as they cannot see how to continue along it. The canal must be crossed by passing under the viaduct, using the road bridge and doubling back on slipways to and from the canal. People also unnecessarily cross the road, thinking that this is the only way to cross the canal, instead of going under the road along the canal.

A series of CANAL-PATH THIS WAY signs would make this easier, so that there is always a sign, as you pass under the viaduct, along the road and slipway to the canal.

A footbridge would also help this continuity. It would avoid the confusing route under the viaduct and doubling-back that is required. It would improve the quality of the experience as it would avoid the busy road. A place mid-way on the curved section of the canal, west of the viaduct, would seem to be appropriate. This would be visible and clear from both directions, with appropriate signage. The plan for a bridge is in Stroud Town Council's Neighbourhood Plan and Rodborough Parish Council support the plan as it improves links from Rodborough to Stroud.

In answer to the specific questions asked by the consultation:

Questions 1: Are these the right Drivers for Change? Have we missed anything you would like to add?

As stated above, SVP believe that improving green infrastructure and biodiversity should be a primary driver, along with responding to the climate change emergency, and that once this priority is in place, further actions will necessarily follow. Continuity, Crossings and Clustering are not drivers for change, rather they are ways of describing activities that could take place.

Questions 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?

The boundaries of the Brimscombe and Stonehouse areas should align with the boundaries of the phase 1a and 1b areas.

The assessment of Western Stroudwater as a 10 on Continuity does not make sense given that the canal is not continuous in this area. There is a risk of lack of focus on the area as a result of the assessment which implies the infrastructure is all complete.

Questions 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?

Questions 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 generic nature of the ingredients and planning language used to describe them make it hard to respond in a meaningful way.

In general, the green infrastructure and biodiversity improvements need to be brought forward in the time frame for all areas, in order to prevent further losses of habitat. The canal through Stroud was built with concrete with limited options for increasing biodiversity. It could have been built with new and varied wildlife habitats, but this opportunity was lost, and we do not wish to see a similar loss of opportunity with the future canal development plans.

Yours faithfully

Canal Project Officer
Stroud Valleys Project

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