



Gloucestershire
Wildlife Trust

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c/o Gloucestershire Wildlife Trust
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11/05/2022

Dear Sir/Madam

I am writing to provide Gloucestershire Wildlife Trust's (GWT) response to the Stroud Canals Vision and Strategy consultation. This includes responses to the specific consultation as well as other comments and concerns.

Firstly, GWT wishes to highlight that the consultation documents do not meet the accessibility standards that would be expected of Local Authority publications. Many of the diagrams and text are very difficult to read in digital or print versions. Whilst visual representation is helpful, it should be accompanied by a clear written explanation of key concepts, which is not always the case in these documents.

GWT welcomes the placemaking approach and supports commitments to enhanced green infrastructure standards. GWT strongly **recommends using the Building with Nature standards** to demonstrate delivery of this. The Trust **strongly objects to any proposal to restore a navigable canal east of Brimscombe** and is pleased to see that this is not included in the strategy. GWT has **five main concerns** about the draft strategy.

- Weak alignment with local and National biodiversity policy and legislation.
- Lack of robustness and poor presentation of the ecological evidence base
- Insufficient safeguarding of existing biodiversity assets
- Inappropriate guidance for ecological enhancements
- Lack of integration of nature into the placemaking approach

If these issues are not addressed it is likely that developments will emerge, having been guided by the strategy, that do not comply with biodiversity legislation or local and national policy requirements. This could increase planning costs and time, which would be counterproductive to the purpose of a Supplementary Planning Document.



@gloswildlife

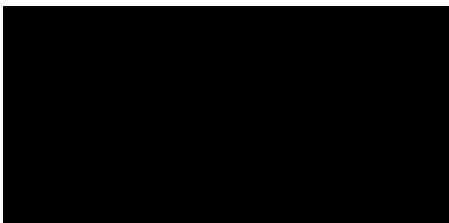
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Gloucestershire Wildlife Trust recommends the following actions to improve the biodiversity content and approach of the strategy including

- Appoint a specialist ecological consultant to undertake a **Strategic Environmental Assessment of the biodiversity impacts**.
- Formally **rule out any restoration of the navigable canal east of Brimscombe, prioritising** this area for **nature** protection and enhancement.
- Align the strategy guidance with **the Gloucestershire Nature Recovery Network** and emerging **Local Nature Recovery Strategy**.
- Incorporate data held by the **Gloucestershire Centre for Environmental Records**
- Commitment to **at least 30% of land** within the canal corridor being **managed as wildlife habitat**.
- Set a requirement for developments within the canal corridor to **deliver a minimum 20% Biodiversity Net Gain**.
- Add a **profile assessment of biodiversity and natural capital value** along the canal corridor, similar to the one provided for carbon.
- Adopt a **triple bottom-line accounting approach** to decision making in order to protect natural capital and ensure that land-use change delivers net benefits for society.

Yours Sincerely



Director for Nature's Recovery

Gloucestershire Wildlife Trust

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