

**From:** [REDACTED]  
**Sent:** 26 May 2022 21:56  
**To:** \_WEB\_Canals Strategy  
**Subject:** canal strategy consultation

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**Hi please take the text in red and bold as my rather late response to these various documents**

**It is an interesting approach .. which I would advise it not appropriate at this stage as there need to be a clear vision and strategy before this detail delivery approach is applied. There appear to be a lack of basic quantitative research on the ground or even a review of existing strategies . Although there is lots of detail this is only generic detail not specific detail**

### **How to respond to the Draft Canals Strategy consultation**

Please review the contents of the Canals Vision and Strategy wallchart (**Document A**) and the Placemaking Frameworks (**Document B**).

#### ***What would we particularly like your views on?***

Whilst you are welcome to comment on any aspects of the material, we would particularly like your views on the following matters:

**This is not a strategy as there is no vision or objective ..for the strategy to deliver**

#### **Drivers for Change**

The Canals Strategy identifies 3 overarching 'Drivers of Change' by which the canal network can maximise its social, economic and environmental benefits.

Continuity – By providing a continuous accessible route the canal can connect communities and create essential links between businesses, services and functions and continuous green infrastructure as a spine through the District

**This is important but it should be made very clear it is the canal corridor not just the canal .. the canal is effectively just a route for movements of people and wildlife.**

**The canal , well technically a navigation is linked directly into various stream and rivers throughout its length and restoration west of stonehouse will link it to the frome in a further two location**

**For wildlife that fact that it connects the cotswold escarpment to the estuary is vital for movements of birds , fish migrating along the corridor as well as mammals from otters to bats .**

**Otter may have territories 20km long , bats may fly 10km to forage and migratory fish may use the whole length of of the canal/river from system. With the further removal of key barriers Sea trout , Salmon and even more eel and lampey are will use the canal corridor . One of the crucial aspects is that the canal and rivers , plus tributaries are linked and with inflows and outflow . The canal and river and the land between and adjacent need to be considered as one ecological unit .**

**Stretches through the urban areas and the canal corridor is restricted by urban build development are likely to be just as important for wildlife and a through route and all other stretches on the canal corridor**

**Therefore from a wildlife point of view I would argue that you cannot allocate any different value / measurement of continuity to each of the different 14 section of the canal corroder**

The function of the water as means of human transport is a secondary one to the towpath although , the effects of climate change , the development of paddle boards , accessible boats and connection the canal network will increase the value of the water as a human transport route .

The crucial aspect of continuity that appears to be missing is water flow along the whole canal corridor and from the tributaries of the streams that flow into the canal as a result heavy rain . The overriding driver of climate change and its implications on eth canal corridor

For human too .. the towpath provide a long relatively flat linear recreation and commuting route for walks, runners and cyclists . At times the towpath is probably at capacity and with the increase in the use of e-cycles over the next 10-20 years alternative to the towpath for cycles will need to provided to maintain the value of the towpath for walker and runners along the whole length ..

There may be some section that are more well used particularly the home to work/school section but these nearly all cross numerous boundaries of 14 sections

□ Clustering - People, activities and places can unite around the canal as a thoroughfare, an attraction, a centre of activity and unique recreational space. In this way the canal can catalyse focussed activity as a new junction of trade and a centre for sociability and community

... I would suggest that these tend to occur where there is a canal bankside development and the canal provide the focus or backdrop for the development ..... So an assessment of unused land and the opportunities as well as ownership , policy and politic are potentially the key drivers at clustering points .

Bridges also are point of clustering for people and in particular wildlife from fish hiding under bridge , bats foraging under bridges, otters marking their territories under bridge , birds nesting under bridges

□ Crossings - By creating a variety of local crossings and connecting activity on the banks of the canal, more strategic connections can be formed at a district level which see people not only accessing the canal corridor but accessing a variety of districtwide opportunities and in doing so being enabled to cross socio-economic boundaries as well as

physical ones... interesting point but crossing are also clusterings of human activity and tend to be linked to economic development either side of the crossing so crossing may actually be vitally important clustering points .. or just places to stand around and chat or just stair along the water .. they are higher so people can look down into the water the physical structures of crossing such as bridges can ( although not all ) be important areas for wildlife creating sheltered areas .. therefore more insects and feeding opportunities for bats and birds . Structures under bridges ca provide nesting , and roosting locations for bats and birds and even territory marking locations for bats and birds. Bridges also provide sheltering for fish and area sto avoid aerial predators

**Questions 1:**

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

Change for what ? the documentation does not define what change is desired .. is the change gradual decline into rack and ruin ... ?

Policy ES11 is a delivery policy rather than policy with a strategic objective

There is no vision or actual strategy. therefore it impossible to determine whether these are the correct drivers for change as there is on clear objective to change to or towards.

So No they are clearly not the right driver for change.

It appears much of the so “strategy “ that we are being asked to comment on is an “emperor’s new clothes” document.. lots of good words and the right motherhood and apple pie sayings ... but no substance . It is wording from urban plans applied in very generic way to a linear feature without a clear understanding of the strategy or vision.

Canal Strategy Areas :

In order to establish how these drivers can benefit each part of the canal network, the strategy breaks down the canal corridor into 14 Canal Strategy Areas based on a layering of physical characteristics, function and policy. Each strategy area has been profiled against the drivers to identify the future role of each strategy area in helping to contribute to achieve the optimum benefits. This is interested concept but without a strategic objective the use of physical characteristic and drivers is largely meaningless

For example, the areas identified at Stonehouse and Stroud have an important role to play in terms of the clustering of activities around the canal and crossings to town and village centres, whilst some of the more rural areas of the network have a stronger role in terms of continuity, providing links between places and providing corridors for wildlife. ... **This statement does not appear to be based on any facts or evidence . I would suggest base on use of the canal towpath over 30 years most of the humans movements along the canal are in the urban areas not the rural areas.**

**The statement that about providing a wildlife corrodor in rural area is just wrong ... a begs the question as whether those working on these documents actually . understand the ecological functioning of the canal corridor. The Canal corridor is a vitally important route for wildlife including a number of highly protected species and a number species linked to eth Severn estuary . The canal and the river frome and the land between and adjacent in the urban areas is vital corridor for wildlife communiting and foraging along the route because much of the surrounding built urban environment is unsuitable for wildlife . I would therefore suggest that this example quoted above is completely inappropriate I would suggest all of the references to wildlife & biodiversity need to be revisited and looked at with understanding of networks and corridors along wetlands and some clear objectives as to what wildlife is to be preserved and what is be be encouraged .... Eg does strategy want to see more kingfisher nesting along the corridor ? provide nesting banks .... One of the key overriding aspects of the canal corridor is that the land between the canal and the various branches of the river is floodplain .. which with the effects of climate change may be inundated more frequently ... there is an opportunity to create wildlife rich wetlands that also sequester carbon along large stretches of the canal corridor**

Each strategy area has also been profiled against sources of carbon generation (using actual parish data) to identify the most important sources to be reduced through future actions.

**This a complete mis use of the carbon impact tool in relation to the canal corridor and is either a very naive understanding of the impact tool or deliberate attempt to cover up a missing element of the work required in this strategy . The impact tool is considering carbon dioxide emission using Defra data for fuel use and them uses proxy measures not actual emissions . It si a good estimate of carbon emission for a parish The estimated emission apply to the whole of that civil parish .. It doesn't allocate emission in a parish to the canal corridor and its use . if this strategy had done that then it would be possible to assess how changes in the canal use or development may or may not reduce carbon emission**

**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?***

***No they are plain wrong either I don't understand what is being said or there is a complete misunderstanding of what a strategic approach is , how water and wildlife and people use the corridor .. how developers view the corridor , how landowners view the corridor***

**Placemaking Frameworks**

Each canal strategy area has a placemaking framework diagram identified. This summarises the key role and character of the area as identified by the profiling and identifies ways in which the area could be improved to fulfil its

role within the canal network.

The framework also suggests types of interventions likely to be required in each area – taken from the following groups: Movement; Urban Form; Uses & Activity, Infrastructure & Utilities, Green infrastructure & biodiversity, Events and programmes

**No 1) it is not clear exactly how these are derived . 2) using the same boundaries for built and urban form as water flow , wildlife and human movements seem to make no sense in planning , transport/movement term , water terms or wildlife ..**

**An intervention of a linear corridor in one location will have knock on effects upstream and down stream on a linear corridor so treating them all separately is naïve in the extreme**

**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?***

**Not really No .. it appears to be trying to fit area based planning concepts into strategic linear corridor failing to take into account that the key driver will be through private investments ... what is in it for landowners and investors ?**

***Do you agree with the carbon reduction opportunities identified?***

**There is not a category for carbon reduction ? what does this question refer too ? is this carbon sequestration or renewable energy generation . ( I note the diagram refers to “energy generation” could this be any type of energy generation gas , coal wood nuclear ?) It mentions moving water ..it should be made very clear that the drop and volumes of water are very small so the generation potential is low but makes no reference to previous studies identifying the best sites for hydro .**

**If this question is referring to sequestration then the scoring in each section is completely wrong . the greatest opportunity for carbon sequestration is through wetland creation between the canal and the various courses of the river . there appear to be no reference to the Glos nature partnership ecosystem services map which identifies areas for carbon sequestration <https://naturalcapital.gcerdata.com/>**

|  
ingredients of the Future Place

The strategy includes a catalogue of more specific ingredients to help deliver the positive change required. These are set out within the following groups: Movement; Urban Form; Uses & Activity, Infrastructure & Utilities, Green infrastructure & biodiversity, Events and programmes.

For each strategy area, a series of ingredients are identified, and colour coded, for delivery within 5-year time periods. These are intended to support the delivery of each of the place making frameworks.

**Questions 4:**

***Do you agree with the ingredients in general terms? Are there other ingredients you would like to identify? Yes in general terms ingredients are fine .. but they have not been applied very well .. possibly because of a lack of real understanding of some of them***

***Do you agree with the ingredients identified for each canal strategy areas? No there is no clear reason why they are there and what outcome they would produce***

***Do you agree with the timeframes for delivery? Should some be brought forward and others pushed back?***

**No ... as it is not explained how these each fit into the strategic objectives. It is all rather motherhood and apple pie rather than providing either a strategic steer or strategic options**

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Supplementary Planning Document  
We would like to use the strategy to help shape future development along the District's canals which requires planning permission. In order to do so, the

strategy will need to be adopted as a supplementary planning document. Supplementary planning documents help to explain how planning policies set out in adopted local plans will be delivered.

In this case, the District Council would like to use the canal strategy as design guidance to supplement Policy ES11 of the District Local Plan (adopted 2015).

**No it fails completely as it does not take strategic approach, it fails to take account of climate change, it fails to take account of the ecology of the canal corridor , fails to take account of land ownership . It concentrates on details which is fine if one has control over the land and water but this is not the case here ...**

## **Delivery Policy ES11**

### **Suggested**

#### **Maintaining, restoring and regenerating the District's Canals**

The Council will encourage the restoration of and other necessary functional improvements to the District's canals down stream of brimscombe port . It will seek to improve access to and along

the canals to encourage use for transport and for leisure / recreational purposes.

Development on the route of, or adjacent to, the Stroudwater Navigation, the Thames and Severn Canal or the Gloucester & Sharpness Canal must not prevent the improvement, reconstruction, restoration or continued use of the canals or towpaths.

All developments adjacent to the canals must reduce carbon emissions respect their character, setting,

enhance biodiversity and historic value as well as have regard to improving and enhancing views along and from the canals. Environmental improvements to any canal's appearance must enhance the ecosystems services of the canal corridor will include enhancement of its historic and biodiversity value.

In assessing any proposals for development along or in the vicinity of any of the Districts three canals, the Council will have regard to any relevant adopted design guidance and policy

Reasonably related financial contributions may be sought via Community Infrastructure Levy or, where appropriate, via legal agreements for contributions towards the improvement or restoration of the related canal and on going management of the towpaths.

The Council is currently producing a new Local Plan, which has been submitted for examination. The emerging policy ES11 is substantially the same as the adopted Local Plan policy. When the new Local Plan is adopted, the Council would like to use the canal strategy to supplement the revised Policy ES11.

#### **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?***

**No its not a strategy .. its delivery tool .. which is fine if the direction of travel has been established .. which it doesn't appear to have been yet the fact that this is being mixed up questions the clarity of the brief or the understanding of the brief**

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

**Yes I would like to see a clear vision or set of vision established and strategic plan to delivery one or more of these visions and then applied the detail approach that is being used here.**

**Using this approach one can't see the wood for the trees.**

**Just looking a aspects of this strategic that I know and understand in detail I would suggest there has been a complete misunderstanding of the ecology of the corridor how wildlife uses the corridor and the opportunities and threats for wildlife .**

**There appears to be a misunderstanding of the use and value of the impact tool and also a lack of understanding of the real opportunities for renewable energy generation or sequestration ... we have one of countries leading organisations on carbon sequestration in wetlands adjacent to the corridor and as far as I can see they haven't been asked for advice .**

**Best regards**

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██████████, Ecologist , Mountain Biker, Facilitator, Co-chair Gfirst LEP Energy Business Energy Group,  
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