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Stroud District Council

For the attention of the Planning Policy Team

BY EMAIL ONLY

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Dear Planning Policy Team

Planning consultation: Stroud District Local Plan – Draft Canals Strategy consultation

Thank you for your consultation email update on the above dated 05 May 2022 which was received by Natural England on the same day. We are grateful for the extra time to respond.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has liaised with the Environment Agency prior to finalising our response. This is in recognition of the common interest we share with the Agency over various aspects of the natural environment. We note and agree with the Agency's comments on the draft strategy for those aspects of the strategy relevant to our remit¹. We wish to check our understanding on some of the fundamental aspects of the strategy and offer additional comments below accordingly. We would welcome the opportunity to discuss relevant issues with the Council before the strategy is adopted as a Supplementary Planning Document (SPD).

Policy context

Natural England notes the draft strategy's and proposed SPD's relationship with policy ES11 in the adopted and emerging versions of the Stroud District local Plan. This policy is entitled 'Maintaining, restoring and regenerating the District's Canals'. We are mindful that planning decisions are made 'in the round' i.e. taking account of other relevant policies in the development plan. For example policy ES6 provides strong protection for biodiversity in and outside designated and local sites. This is important because some stretches of the disused canal system are particularly rich in wildlife (e.g. Chalford to Sapperton). The approach to 'restoration' here would need careful consideration, both from a biodiversity and a 'net zero carbon' point of view. The draft strategy currently proposes an approach to placemaking (please see quote from Wallbridge Pilot Site document²) that seeks to

¹ Biodiversity including flora, fauna, human health, soil (including waste and contaminated land issues), water (water quality and resources), air, climatic factors (including strategic flood risks), material assets (including geological interests and infrastructure), cultural heritage and Landscape.

² *The Toolkit for Future Placemaking The Future Place methodology brings together a series of top down/bottom up tools into a Toolkit for Future Placemaking, satisfying the need for locally derived, future focussed design. Many visions, strategies, design guides and reports have at their heart an attempt to universally improve design. They bring much needed general awareness of design process and basic principles to be applied everywhere, but few are able to be employed systemically or are suitable for use in the early stages of placemaking and plan formation. Neither do they provide the procedural means by which locally distinctive and place specific strategies can be achieved and remain intact from vision through to delivery.*

ensure 'vision' becomes the delivered reality. We understand this aim but would strongly encourage the Council to recognise the need for an adaptive approach in order to allow an agile response to ongoing partnership work and further evidence around the twin, key themes of Climate Change and Nature Recovery. The draft strategy's 'process diagram' (p37) offers scope for suitable new wording (underlined):

'This Project Delivery Process Guide therefore provides the procedural means by which projects and funding can be aligned to implement the vision for the whole canal corridor. It is a process that maybe revisited as new delivery opportunities arise, existing opportunities change, new evidence emerges or further detail is explored.'

In terms of the wider policy context we note and agree with the Environment Agency's comments on the draft strategy's relationship with key strategic policy documents and relevant partnerships such as the River Severn Partnership.

Biodiversity

Consistent with our policy context comments Natural England shares the Environment Agency's views about the need for the draft strategy to take greater account of environmental constraints. We offer specific comments on the proposed 'ingredients' at Annex A.

Strategic solutions

We draw the council's attention to the emerging and revised 'strategic solutions' for increased recreational disturbance to the Habitats Sites in the area. These are as follows:

- Cotswold Beechwoods Special Area of Conservation (SAC)
- Severn Estuary SAC, Special Protection Area (SPA) and Ramsar Site
- Rodborough Common SAC

Visitor surveys for these Habitats Sites show that a large proportion of the district's canals fall within the area where most visitors to these designated sites live (the 'zones of influence'). Scope exists through use of the final strategy to proactively manage the risk of additional recreation pressure. Measures may include signage and interpretation as well as improving links between existing informal recreation space and working in tandem with the Habitats Sites' mitigation measures to create new informal recreation space e.g. 'Suitable Alternative Natural Greenspace' (SANG). Natural England would welcome further dialogue with the Council on this subject as the Habitats Sites strategic solutions develop.

Mobile species and 'functional linkage'

Further opportunities arise in respect of 'mobile species' designated as part of the Severn Estuary SAC and Ramsar Site and the Wye Valley and Forest of Dean Bat Sites SAC. The estuary and 'functionally linked watercourses' such as the River Frome support a number of migratory fish species which spend part of their life cycle in the freshwater environment. The greater and lesser horseshoe bat species associated with the Wye Valley and Forest of Dean seasonally travel between their roosts in the SAC to Woodchester Park in Stroud district, relying on favourable vegetation cover and very low light levels to make the journey. The final strategy SPD should offer valuable scope to allow synergies to be identified and delivered, taking account of the Habitats Sites conservation objectives.

On line survey results concerning ecological capacity

We note the key findings from the on line survey for the Whole Strategy. Strength no3 appears to interpret perceptions of the canal system's ecological capacity as empirically based fact. This is mistaken and we urge the Council to review and amend the document accordingly.

Social prescribing

Natural England welcomes the draft strategy's reference to this theme. Natural England has recruited a small team of staff to work with each of the Regional Social Prescribing teams within the 7 NHS regions across England. These Natural England colleagues are based in Area Teams and work closely with NHS colleagues to contribute to and develop, a programme of work to embed the natural environment as a mainstream offer to address current health challenges and inequalities – i.e. 'Green Social Prescribing'.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact me on [REDACTED]
For any new consultations, or to provide further information on this consultation please send your correspondences to [REDACTED] [@naturalengland.org.uk](mailto:[REDACTED]@naturalengland.org.uk).

Yours faithfully

[REDACTED]
Lead Adviser – West Midlands Planning for a Better Environment Team

Annex A

Comments on 'Ingredients of the future place' (Q4)

Movement

Signposting, navigation and trail finding – This represents both an opportunity and a risk in terms of the ongoing evidence gathering relating to recreational disturbance to Habitats Sites such as the Cotswold Beechwoods SAC, Severn Estuary SPA and functionally linked land in the Severn Vale.

- i. Opportunity – scope for improved public access and recreation resource as an alternative to current visitor destinations at Habitats Sites. E.g. Suitable Alternative Natural Greenspace (SANG) on land adjacent to the canals, with access routes facilitating SANG use.
- ii. Risk – Easier access to the Habitats Sites and sensitive locations (including Functionally Linked Land) may result in higher numbers of visitors.
- iii. Response – Spatial planning and careful management will be key. Mitigation Strategies for the Habitats sites are in progress. Natural England's emerging Green Infrastructure (GI) Standards will provide further criteria to help place the canals in a recreation/health and wellbeing context, while the recently published mapping tool may also be valuable: [Map \(naturalengland.org.uk\)](http://naturalengland.org.uk)

Uses and activity -

- i. Diversify activity - see above regarding recreational Strategic Solutions focused on Habitats Sites.

GI and biodiversity

- i. Linking canopy – While Natural England supports the selection and management of suitable semi natural habitats and their features, such as trees, to achieve biodiversity and climate change objectives it will be very important for optimum habitat types to be chosen taking account of current or potential value for wildlife and the landscape character of the locality. In this way the strategy can add value while minimising risks to existing wildlife habitat and landscape character. NE publication 'Carbon Storage and sequestration by habitat (2nd Edition)' provides more information. Link - <http://publications.naturalengland.org.uk/publication/5419124441481216>
- ii. Connecting with nature – NE welcomes the strategy's aspirations on this theme. The health and wellbeing and inclusion themes all resonate here.
- iii. Natural Wayfinding – We welcome this reference. The strategy offers scope to link or provide new access to new and existing recreation resources such as country parks (see above re SANG).
- iv. Canal habitats and species – Further dialogue is needed to understand the relationship between the strategy and existing biodiversity resources along the network's length. NB Concerns re loss of rich wildlife habitats/interest along disused sections as a result of canal restoration.
- v. 'Wild banks' - Is this describing adjacent semi-natural habitats beyond the towpath 'zone' and their mgmt. e.g. floodplain meadows, wetlands?

Infrastructure and utilities

- i. Carbon sequestration – see link to NE publication (above)
- ii. Energy generation – NB EA comments. Relevance to Severn estuary migratory fish species (hydropower) and potentially also SPA birds (solar/wind).

Annex ends