

Consultee Comment	Response from the Wilder Frome Project Group	Context of the response from the SAP	Relevant Section of the SAP
<b>1: Environmental priorities missed?</b>			
The river has become a popular venue for wild swimmers - has this been taken into account?	Although they may not have been specifically mentioned, we are conscious that the river is used by a wide range of people including wild swimmers. Many of the objectives set out in the Vision and Strategic Action Plan (SAP) will improve the health and cleanliness of the river, making it a more enjoyable place for everyone. However, we are conscious that to name one group in the SAP runs the risk of making other groups feel excluded.	"The problem of litter and microplastics is one that is now unfortunately found in every river system, and the Frome is no exception. The catchment is blessed with an extensive network of public footpaths adjacent, or in close proximity, to rivers and canals. While this provides plenty of opportunity for negative impacts such as dropped litter and disturbance, it is also perfect for increasing positive engagement with communities who will benefit from an enhanced water environment." (page 7)	4. Cleaning up our rivers
Whilst eel and salmon are priorities, they dominate the vision and thought should be given to other species e.g. trout	We have included a few more sections highlighting invertebrates and mammals. However we don't want to reduce the amount we mention eel and salmon as this is such a vital habitat for them.	"As well as storing vast quantities of floodwater, healthy river floodplains can support a huge range of wildlife, including many declining freshwater species." (page 5)	2. Making space for wildlife in and around the Frome
Might have fallen into the same trap as the Canal strategy and does not recognise how interlinked the canal and the river Frome are	We have added a few more sections on the interactions with the canals, however we didn't want to double up on the Canals Strategy put out by Stroud District Council. You can find the Canals Strategy linked on the Severn Vale CaBA website in our 'Resources' section.	"Abstractions of water from the lower reaches of the Frome into the Gloucester and Sharpness canal also depletes flows." (page 8)	5. Restoring healthy flows in Stroud's rivers

<p>No mention of potential negative impact of disturbance by dogs, domestic cats, and wild swimmers</p>	<p>We have added a project to the pipeline focusing on teaching communities about the impact of pets on wildlife. We have also included a section on disturbance in the SAP.</p>	<p>"While this provides plenty of opportunity for negative impacts such as dropped litter and disturbance, it is also perfect for increasing positive engagement with communities who will benefit from an enhanced water environment." (page 7)</p>	<p>4. Cleaning up our rivers</p>
<p>No Mention of predator control e.g. American mink</p>	<p>Predator control is very important and we have amended the SAP to include the possibility of using this as a management method. American mink are mentioned as an invasive non-native predator species.</p>	<p>"We will work to reduce the threat posed by invasive species, limiting their spread where eradication is not possible. We will work together to identify the means to limit the influence of invasive species, including considering predator control." (page 9)</p>	<p>6. Taking action on Invasive Non-Native Species</p>
<p>Brimscombe port development could provide a crucial reservoir - a magnet for wildlife, not a blockage</p>	<p>The catchment partnership would very much like to see any development of Brimscombe used to maximise opportunities for people and wildlife.</p>		
<p>The interaction of canal inflows and river water quality need to be included</p>	<p>We have added a few more sections on the interactions with the canals, as this is very important to the health of the river</p>	<p>"Water is also lost within the many on-line ponds and lakes, especially those without appropriate lining, as well as in various interactions with the canal." (page 8)</p>	<p>5. Restoring healthy flows in Stroud's rivers</p>
<p>All run-off from all road &amp; developments needs to be considered</p>	<p>We have added a sentence on the impact of road and infrastructural run-off.</p>	<p>"Work with Severn Trent Water, Gloucestershire Highways, Local Authorities, and communities to deliver a programme of Green and Blue Infrastructure [all the individual parcels of natural space and features within both our urban and rural spaces that, when connected, deliver quality of life and environmental benefits for communities and the nature that thrives within them], intercepting highway, surface water and roof runoff through the creation of a minimum of 20 SuDs (Sustainable Drainage systems) features." (page 7)</p>	<p>4. Cleaning up our rivers</p>

<b>2. Do any words need clarification?</b>			
'Headway' region of the river (no mention of this in the document, possible they mean 'headwater')	We have added a short description of headwaters as this may not have been clear.	"It is our ambition to reconnect the river, allowing fish to move from the mouth of the Severn right through to its headwaters (its source)." (page 4)	1. Making it easier for fish to migrate and move through the Frome catchment
'Yellow Fish Days'	This is the name of a particular campaign aimed at getting people to understand the connection between the drains in their towns and the wider water environment. We have amended to 'misconnection campaigns' and added a link on the Severn Vale CaBA website to the Yellow Fish Days project.	"Run annual misconnection awareness campaigns, engaging 10 schools, and various local communities and businesses" (page 7)	4. Cleaning up our rivers
'ELM'	We have added a link to the .gov website explaining ELMs on the Severn Vale CaBA website in the Resources section.	"The removal of the basic payment scheme and the introduction of the new Environmental Land Management (ELM) scheme..." (page 6)	3. Working in the wider landscape of the River Frome
<b>3. Any project ideas?</b>			
Connecting with canal restoration for recreational activities	River health and cleanliness is vital to recreational activities and many of the objectives, especially those in section 4 - Cleaning up our rivers, will vastly improve the river for recreation	"We will strive for the Frome to achieve Good Ecological Status under the Water Framework Directive along its entire length, including key tributaries."	4. Cleaning up our rivers
Every weir or blockage from the Severn to the source should be opened up to allow passage of all migratory fish	While this is a really good ambition, it would unfortunately not be feasible by 2030 which is the scope of the SAP. If this phase is successful, we can make the 2050 objectives more ambitious	"We will make the river channel passable up and downstream for fish and other aquatic species, including implementing multi-species fish passes at all high priority barriers throughout the Frome catchment. " (page 5)	1. Making it easier for fish to migrate and move through the Frome catchment

Ebley mill should be in list of priority weirs for fish pass	Removing barriers at Ebley mill, Kimmins Mill, and others have been added as 2030 objectives	"Implement fish passage solutions at the Frome tidal flap, Whitminster Weir, Fromebridge Mill Weir, Ryeford Mill, and Ebley Mill Weir" (page 5)	1. Making it easier for fish to migrate and move through the Frome catchment
Remnant population of White Clawed crayfish should be protected - if no Signal crayfish in area maybe breeding/reintroduction?	Agreed - White Clawed Crayfish are a very important species and there are several mentions of them in the SAP, especially in section 6	"The River Frome and surrounding watercourses support a range of rare and important species, such as white-clawed crayfish, water vole, otters, and dippers. There have been numerous restoration projects in the Frome catchment which aimed to address protection of these by reducing and, where possible, eradicating INNS." (page 9)	6. Taking action on Invasive Non-Native Species
Bats - creating important feeding habitat, provision of new artificial roost sites, and further reducing lighting throughout the Frome corridor	Fortunately many of the 2030 objectives will create natural bat habitat so we don't think it will be necessary to create artificial roosts. Bats are vital in this ecosystem and Daubenton's bat has been added as a key species.	"Key species supported: Stoneflies, Daubenton's bat, and a range of pollinator species" (page 7)	3. Working in the wider landscape of the River Frome
Get water vole upstream of Stroud where there is good habitat	Water voles have been included in the SAP as a key species. There is also mention of predator control to help increase vole populations	"Control mink to help protect and expand the significant water vole population below Stroud." (page 9)	6. Taking action on Invasive Non-Native Species
Increasing scope of flood plain wetlands to include all lands between Frome and canal to the Daneway where practical – there is opportunity for a near continuous wetland	While this is a great idea, a continuous wetland is not practical within the 7 years we have left to achieve the 2030 objectives. If this phase is successful, we can make the 2050 objectives more ambitious	"The aspiration is to create a naturally functioning wetland complex that will provide a safe space for wildlife, store carbon in the face of climate change, and hold and filter water. The mosaic of habitats will include wet woodland, scrub-edges, surface flow marsh, marginal vegetation, reedbeds, floodplain meadows, scrapes, and ponds." (page 5)	2. Making space for wildlife in and around the Frome

A very intensive, but sensitive and ongoing, education programme about the impact of pets on wildlife	We have decided to add a project to the pipeline focusing on teaching communities about the impact of pets on wildlife rather than including this in the SAP.	See page 11 - Delivery of the Vision to find a link to the pipeline of projects	Project Pipeline
Artificial holts for otters in banks along catchment	We are focusing on maintaining the healthy otter populations we already have by increasing water cleanliness and fish abundance in the Frome.	"We will strive for the Frome to achieve Good Ecological Status under the Water Framework Directive along its entire length, including key tributaries." (page 7)	4. Cleaning up our rivers
Sand martin nesting boxes - target of three: one Lower Frome, one Stroud/canal, one Upper Frome/canal	These have been added to the project pipeline	See page 11 - Delivery of the Vision to find a link to the pipeline of projects	Project Pipeline
Swift towers, and kingfisher nesting holes			
<b>4. Thoughts on where to get funding for projects?</b>			
Greening Government Commitments	Thank you for these suggestions, we will consider them during project development	See page 11 - Delivery of the Vision to find a link to the pipeline of projects	Project Pipeline
Using students from engineering/building courses to help build fish passes			
Using Canal Trust volunteers with building skills			
<b>5. Any interest in citizen science monitoring?</b>			
Yes	We have added a commitment to set up a citizen science monitoring program including a Smart River Hub.	"Establish a citizen science monitoring programme (including at least one Smart River hub) for the River Frome.' (page 10)	8. Community Engagement and Partnership
<b>6. Any other comments or questions?</b>			

Any consideration to new species that might come here due to climate change e.g. bee eaters?	Hopefully the 2030 objectives will support natural ecosystem processes - hosting a wide range of species, including those brought here by a changing climate		2. Making space for wildlife in and around the Frome
It would be good to get the views of all riparian landowners, homeowners, and businesses along the catchment	While this is a great ambition, it is difficult in practice. We tried to put this consultation out widely and now need to promote the final document through community engagement	"This plan has been developed as part of the Severn Vale Catchment partnership. The group welcomes the opportunity to work with any organisation or individual with an interest in improving the water environment of the Frome." (page 10)	8. Community Engagement and Partnership
Target: healthy populations of threatened species all the way to Daneway	This would be very hard to achieve, especially by the 2030 end-date of the SAP, and unfortunately we do not have the resources to monitor all threatened species. The projects in the pipeline will look to include monitoring to quantify and qualify change.	"We will improve understanding and knowledge of the Frome catchment for the benefit of all by supporting the establishment of Smart River Hubs and encouraging individuals and communities to help protect, monitor, and enjoy their river." (page 10)	7. Monitoring and Data
For the Cotswolds AONB we now use the title 'Cotswolds National Landscape' (CNL) which should be added (with the description) to the 'What makes the Frome catchment special' section	Good to know - the SAP has been amended to include the correct title	"...whilst much of the middle and upper catchment falls within the Cotswold National Landscape (formerly AONB)" (page 3)	Introduction
Is management/eradication realistic for Himalayan balsam?	We understand the concern, as Himalayan Balsam is challenging to totally remove, but we think that the aim of eradicating balsam across 10ha is achievable by 2030	"Control and remove Himalayan Balsam across 10ha of riparian habitat." (page 9)	6. Taking action on Invasive Non-Native Species

Baseline monitoring needs to be possible for 20 years or more	Ideally monitoring would be carried out for 20+ years, however it is unlikely that there will be the resources to allow us to do this. We will aim to develop citizen science projects to carry out as much monitoring as possible.	"We will improve understanding and knowledge of the Frome catchment for the benefit of all by supporting the establishment of Smart River Hubs and encouraging individuals and communities to help protect, monitor, and enjoy their river." (page 10)	7. Monitoring and Data
Many peoples' first engagement with the river has been when it floods their house. It is important to beware of this and think carefully about fears	We will be aware of this as we engage with local communities.	"Effective community support can increase the sustainability of a project and is achieved through early and continuing engagement with local people." (page 10)	8. Community Engagement and Partnership
NFM is probably best kept to upper stretches and agree with working with landowners on upper stretches of Frome and its tributaries	We will consider the terminology we use in engagement e.g. Nature-based Solutions/Working with Natural Processes to be clear that we are considering all the different types of natural flood management	"NFM interventions will be incorporated into our general approach to river restoration and contribute to the reduction of downstream flood risk" (page 6)	2. Making space for wildlife in and around the Frome
AONB designation and the management plan will support the ambitions and the objectives, but a potential constraint.	This will definitely be important to consider going forward.	"The lower reaches lie adjacent to the Severn Estuary RAMSAR site, Special Protection Area, Special Area of Conservation, and SSSI designations whilst much of the middle and upper catchment falls within the Cotswold National Landscape (formerly AONB)." (page 3)	Introduction
Would be good to more fully recognise the work on natural flood management by SDC and partners since 2014	We recognise and appreciate the work that our partners have completed, but as this is a forward looking document, we have decided to focus instead on the work that we can do with SDC and partners in the future.	"Run an annual event for all stakeholders to discuss progress towards achieving the vision" (page 10)	8. Community Engagement and Partnership