

# SAVE CANNOP PONDS TEAM

## COMMENTS ON FORESTRY ENGLAND'S STATEMENT

### “CANNOP PONDS THE NEXT CHAPTER”

Dated January 2023

#### FOREWORD

The Save Cannop Ponds Team have now had time to read and digest Forestry England's recent document “Cannop Ponds The Next Chapter”. We are very disappointed with the content, you would expect such a document to be factual, honest and transparent, but unfortunately it is the polar opposite. Much of its contents are not only inaccurate but are also very misleading. Forestry England have had plenty of time and ample feedback to gauge Public Opinion. But they appear to be intent on completely ignoring it.

It is obvious from the document's content that Forestry England's preferred option, is and always has been, to remove the dams and (in technical terms) 'discontinue' the reservoirs. As of today's date the SAVE CANNOP PONDS online petition has a total of 41,413 people, the vast majority of these people are local Forest residents. The petition has intentionally not 'gone national' yet in order to give a true measure of local opposition. In addition there are a number of paper petitions in local shops, pubs and businesses, with 100s of these also signed and the number grows daily.

The Forest of Dean District Council has voted unanimously for the retention of the ponds, Local MP Mark Harper has stated that he wishes the ponds to remain as they are and on January 20<sup>th</sup> the Forest Verderers (an ancient institution dating back to the Norman Conquest, almost 1000 years ago) added it's support for the ponds and opposition to their removal.

Clearly THE WILL OF THE PEOPLE in the Forest is to SAVE CANNOP PONDS.

Our Team would like to express its thanks to everyone who supports the Campaign, special thanks to those that have given up their valuable time and to all those that have helped by purchasing a Calendar. What follows is a comprehensive review of the Forestry England Document, we understand that not all of you will have the time to read our comments in their entirety so we therefore list the important comments as bullet points as follows:

- The plan, as we see it, is for FORESTRY ENGLAND to remove the dams and drain the ponds at almost any cost. This is what they want. The people of the Forest do not. The district council does not, the Verderers do not and the local MP does not. Where is the democratic process? Why should FORESTRY ENGLAND have the casting vote that obliterates all the others? This is appalling behaviour for a public body !
- Will the much vaunted 're naturing' part of the plan even work? On Page 28 of the document FORESTRY ENGLAND admits “**It is not possible to determine whether the.. (plan)... will deliver the range of anticipated ecological benefits**” They don't actually know... but they are keen to risk our beloved landscape anyway... just in case!
- Are the ponds a vital ecological feature, as they now are and how they have been for 200 years? On page 28 FORESTRY ENGLAND says “**Nor can we be sure that the ponds aren't performing an essential role..**” So they admit they could be about to ruin something vital, that works, in order to replace it with some pipe-dream about which they are not actually sure! This is ridiculous. This is risking 'throwing out the baby with the pond water' , and for what benefit? They cannot even be sure there is one and that is completely unacceptable.
- Forestry England claims “Cannop Ponds are not safe” but the head of Reservoir Safety for the Environment Agency stated in a letter to Yorkley & District Angling Club dated November 2022 “**I also confirm that Forestry England have made the Reservoir Safe and are managing the risks this reservoir poses to the public downstream**”. FORESTRY ENGLAND'S claim is therefore not true.
- Forestry England claim potential serious loss of life in the event of a dam failure but, under the Reservoirs Act 1975 Cannop Lower is a category C breach risk which to quote the relevant definition on the GOV.UK website “Category C where a breach would pose **negligible risk to life and cause limited damage** This means a breach is very unlikely to cause any major damage, or pose serious risk, to Parkend and its residents
- The bald claim on page 10 that “neither of the spillways are able to contain a 1 in 150-year flood event” and “both dams are likely to breach in an extreme rainfall event” are not supported by the January 2022 Flood Report by Binnies (for FORESTRY ENGLAND) which says on page 26 of the lower dam “outflows in a 150 year flood are confined to the

spillway channel” and the upper dam “outflows entering the spillway...remain confined to the spillway “ in neither report do they claim the dams would breach. They do say any excess water could spill over the top , like a river overflowing it's banks – but this is not saying they will fail as a result.

- Forestry England insist any work will cause serious changes to the ponds and surrounding area including a complete draining of the ponds while work is in progress. Yet remedial works to the spillway and surrounding sections of the dam , as required by the Environment Agency could be carried out with the ponds only partially drained in conjunction with the use of temporary dams. This would have the minimum impact on the pond and its ecosystem as a whole. An option Forestry England does not seem to even consider.
- How can Forestry England call removing the nearly 200-year-old historic dams “redressing a previous intervention” as if they are clearing away unwanted rubbish? What nonsense! How can replacing the near 200-year-old pond ecosystem with an unproven new MAN MADE alternative be any less of an “intervention” ? Any 're-naturing' work that might be carried out would always be entirely MAN-MADE.
- There is frequent reference to “Ageing dams” as if that in itself is a reason for removal. The age of a dam doesn’t necessarily make it unsafe. The Reservoir Act 1975 is there to ensure dams are kept safe. Some UK Dams are 900 years old ! The independent , government appointed engineer stated in the 2022 section 10 report for the Lower Pond, “**I consider the Dam to be in Good Condition**”. Forestry England’s statement that both structures “will fail” is inaccurate and contradicts the official view.
- Forestry England’s suggestion that they have a “conscience” about the the reservoirs is ridiculous. How can they have a conscience if they ignore over 41,000 local people, all the elected district councillors, the Forest Verderers and the local MP (who is also a cabinet minister).
- How can you “renaturalise” in the name of “biodiversity” a 200-year-old ecosystem already rammed with natural life? **1100 different species have been recorded** within a 1000 meter radius of the Ponds. Why would you remove the unique pond ecosystem that supports them all for

a “wetland habitat” of a type that already exists above, in between and below Cannop Ponds ! What would be the gain? We can all see what the loss would be.

- Forestry England has suggested Cannop could become “another Wenchford” which if you know the area, you will be aware has very little of the biodiversity you find at Cannop, but it does have a lot more picnic tables. We already have one Wenchford, we have one Cannop Ponds system. We do not need to lose the latter for a duplicate of the former.
- Much is made of the “OUR SHARED FOREST” land management plan published in 2019 , indeed it is quoted as if it is the blueprint and justification for the entire plan . However it was drawn up with minimal “stakeholder” or public consultation (have you even heard of it, let alone been asked for a view while it was being created? ) It had no democratic basis and so cannot be seen as anything other than Forestry England’s own plan, posing as that of some 'consultation process' that very few were even aware of. Yorkley & District Angling Club have been tenants of Forestry England, paying rent since 1958 and were not even invited to take part in the 'consultation'.
- In OUR SHARED FOREST Forestry England are quoted as claiming “Our larger lake systems are all man made and ... **While we are not proposing to remove these lakes,** we will review options “ So what has changed between 2019 and 2022 ? And why have they used OUR SHARED FOREST as a master plan and then ignored their own stated aim?
- Forestry England stating that the dams were designed or built without flood mitigation in mind is without historical foundation . The ponds purpose was to provide for a large water wheel in Parkend and it is very likely that the system was in fact desgned with various methods of control (sluices etc) but these have fallen into neglect or been removed during the intervening 200 years.
- This criticism from Forestry England that “ the reservoirs ....have since been artificially stocked with non-native species for their fishing value” Is almost laughable as FORESTRY ENGLAND themselves have been financially benfitting from the fishing at Cannop themselves! Yorkley & District Angling Club have leased the site and paid rent since 1958 (64 years). The 10,000-15,000 fish contained in the ponds are naturally

produced UK Native Freshwater Fish species, with the exception of one or two Chinese Grass Carp, which were **put there by Environment Agency** in 1982, in an effort to reduce the Invasive “Nuttalls Pond weed” . The Angling Club themselves have removed tonnes of this weed with not even an offer of help from FORESTRY ENGLAND. Does this not sound like total hypocrisy ?

- Why the insistence that FORESTRY ENGLAND wish to “reinststate the natural watercourse” beneath a pond system that has existed for nearly 200 years? What is there to be reinstated? Nothing is left so would need to be MAN MADE once again FORESTRY ENGLAND has problems differentiating between something occurring 'naturally' of it's own volition and something that they propose to actively create – which cannot by definition then be considered the proposed “ natural option”
- The ponds are a unique well established ecosystem, largely formed by nature taking over a former industrial pond and being given 200 years to do so. How can destroying such an ecosystem count as “restoring “ anything? Removal of the dams and draining the ponds will be an act of **ecological vandalism** the scars from which could take generations to heal.
- We all agree that the dams and ponds are an important part of our industrial heritage but FORESTRY ENGLAND claim in several places that any work done, whatever it leads to, will wreck this heritage. Why? if the repair option is taken as required by the engineers report, Forestry England will have the choice of repairing in a manner sympathetic to this heritage. In fact if the dams were 'listed' then repairs could only be carried out that were sympathetic to its heritage, and removal of the dams would not be an option.
- The suggestion that the removal of the reservoirs might unveil earlier stages of local heritage is complete nonsense. It would be like knocking down Windsor Castle to see if the foundations are Roman.
- We believe that both the repair option and the replacement option can with the assistance of temporary dam systems be carried out without the need for a full drain down, the full drain down is in our opinion only relevant to FORESTRY ENGLAND'S preferred choice : The removal of the dams and discontinuance of the reservoirs.

- On Page 12 you find the line “costs will not be the main driving factor behind any decision” yet on Page 11 they have already said the removal of the ponds would be “going forward whilst removing the long-term risks and costs associated with maintaining a registered reservoir” so clearly they do have costs in mind. The “risks”, as we have seen, are debatable .
  - They also say “ The requirement for maintaining the artificial structures in place at the reservoir will be an ongoing and potentially resource-intensive issue” is a negative aspect , but on the previous page say what they propose in it's place includes “**raised walkways, paths and wooden bridges**”. Are these not “artificial structures” ? Would they not have a “ requirement for maintaining..” becoming “...potentially a resource-intensive issue” ? Once again hypocrisy and double standards by FORESTRY ENGLAND , contradicting their own claim.
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BELOW IS A DETAILED RESPONSE TO THE ENTIRE DOCUMENT, PAGE-BY-PAGE  
*FORESTRY ENGLAND'S QUOTES ARE IN RED WITH OUR COMMENTS BELOW*

PAGE 5

**“Simply doing nothing is not an option”**

Doing nothing is mostly what Forestry England have done up until now refusing to carry out the remedial works required in the independent Dam Report of May 2021. These were enforceable by the Environment Agency under the Reservoirs Act 1975 the deadline set was November 2022. They seem to be focused on pushing through the removal of the dams and completely ignoring the repair option and it's legal deadline.

PAGE 5

**“But they aren’t safe in their current form”**

Tony Deakin is head of Reservoir Safety for The Environment Agency in an email to Yorkley & District Angling club dated 3<sup>rd</sup> November 2022 he quoted the following: “I can confirm that the deadline is November 2022. I can confirm that we have been in contact with Forestry England so that this matter can be resolved. ...In the meantime, I can also confirm that Forestry England have

**made the reservoir safe and are managing the risks this reservoir poses to the public downstream.”**

PAGE 5

**“Securing the man-made reservoirs to modern standards, in line with our legal obligations, comes with great disruption and change”**

Remedial works to the spillway as required by the Environment Agency were the legal obligation, which has been ignored. These would have the minimum impact on the pond and its ecosystem, a full drain down would not be required for this option only a partial drain down in conjunction with the use of temporary dams. No “Great disruption and change” needs to result.

PAGE 5

**“The exploration of alternative futures for Cannop presents possibly the most exciting regeneration project in the Forest of Dean- one that has the potential to redress a previous intervention and reinstate an invaluable wild ecosystem”**

How can Forestry England call removing the nearly 200-year-old historic dams “the most exciting regeneration project” ? No locals are remotely excited by the idea, in fact it repels us all. “...redressing a previous intervention” is nonsense, how can replacing the near 200-year-old pond ecosystem with an untried, unproven, unpopular, newly man-made 'wild brook ecosystem' not be a further intervention in itself? And no-one can 'reinstate' a 'wild ecosystem' , it has to be a new man-made creation and not in any way 'wild' . The people of the Forest of Dean do not want such a project they want the ponds to remain as they are.

PAGE 9

**“Following a recent mandatory inspection by an external and independent reservoir engineer, the ageing dams at Cannop Ponds were found to present more significant issues than previously thought. “**

Mark Harper MP. The current Minister for Transport in the cabinet, who has gone on public record in saying he sees NO GOOD REASON for Cannop Ponds to be removed saw the unredacted report this refers to and said he saw 'nothing new' in it that made him change his mind . Clearly the 'issues' are not as significant as FORESTRY ENGLAND would like us to believe.

PAGE 9

“If either dam wall was to breach, that is if the embankment were to fail and the entirety of the reservoir water body released, as a result of the increased volume of water, it would have *potentially catastrophic* impact on the communities downstream. Flood risk mapping shows that Parkend, Whitecroft and Lydney would be vulnerable to flooding”

Under the Reservoirs Act 1975 Cannop Lower is declared a “category C breach risk”. The quote the relevant section on GOV.UK “Category C where a breach would pose **negligible risk to life and cause limited damage**. Therefore, this includes areas that are “inhabited” only spasmodically. For example, footpaths across the flood plain and playing fields. In addition, this category covers loss of livestock and crops. This means any flooding would not be “potentially catastrophic” as claimed. The nature of the dam, the valley and the brook all mitigate against it and the claim does not match the definition of a “Category C” breach risk.

PAGE 9

“All factors considered, it is our obligation to act to question whether proceeding with extensive corrective works to the reservoirs dam and surrounding infrastructure remains the most appropriate and responsible course of action.

The only legal obligation Forestry England have is, to carry out the remedial work required by the Environment Agency under the Reservoirs Act 1975. It has failed to do this yet it talks of being “appropriate and responsible”.

PAGE 9

“Alternatively, could we pursue a more natural option, returning Cannop to something akin to the kind of habitat that it would have been before, remedying the interventions of the past and potentially providing a better future for Cannop ponds”

Same nonsense as earlier in the document, what can be more natural than the existing near 200-year-old pond ecosystem. Anything replacing it would be, by definition, man-made and NOT natural.



PAGE 10

“...neither of the spillways are able to contain a 1 in 150-year flood event...both dams are likely to breach in an extreme rainfall even”

These claims are not supported by the January 2022 Flood Report by Binnies (for FORESTRY ENGLAND) which says on page 26 (of the lower dam) “**outflows in a 150 year flood are confined to the spillway channel**” and (of the the upper dam) “outflows entering the spillway...**remain confined to the spillway** “ In neither report do they claim the dams would 'breach' ( by 'breach' it is assumed FORESTRY ENGLAND means, or intends to imply, that they will in some way fail or collapse. Their terminology is ambiguous here) Binnies' report does say any excess water could spill over the top edge of the upper dam , in the way a river overflowing it's banks – but this is not saying or implying that they will actually fail as a result.

PAGE 10

“The significance of the issues identified at Cannop Ponds, the serious concerns about the ageing dam’s resilience to our changing climate and the resulting interventions required mean that it is our duty to explore further options for the future of the Ponds, we couldn’t in good conscience do any less”

Ageing dams doesn’t necessarily mean unsafe dams, that’s what the Reservoir Act 1975 is there for, to keep them safe, Forestry England’s suggestion that they have a conscience is ridiculous in itself. How can they have a conscience when they ignore 41,000 local people, all the district councillors , the Verderers and the local MP? Why are we all being ignored by FORESTRY ENGLAND ? They are employed as public servants, not dictators. They should not go against the democratic will of the majority and it's elected representitives.

PAGE 10

“The “repair and replace” option is responding to the actions identified by the independent engineer inspecting the dams and enforced by the Environment Agency. This is by no means the “simple” option.”

Forestry England are stating, the “repair and replace” option as though it is one option this isn’t true these are two separate options.

- a) The repair option is repair/remedial works as requested by the independent dam engineer; the exact works required are unknown to

the public but it appears most of the required works are to the spillway of Cannop Lower. Carrying out the works required under the Reservoirs Act would almost certainly be both the most cost-effective option and the option with the least impact on the ponds.

- b) The replacement option, this option would be any works in excess or additional to the works required by the independent dam engineer, this could include a total rebuild.

PAGE 11

“The “renaturalise” options are variations and degrees of how we might renaturalise the site by removing the dams, returning Cannop Brook to something akin to the riverine wetland habitat it would have been before the industrial interventions of the past.”

How can you “renaturalise” a site which nature has already been reclaiming on it's own since 1866, the date at which the primary industrial use of the ponds ceased. It is now rammed with natural life, 1100+ species call it home, so why would you remove this unique ecosystem for the stated aim of creating “a riverine wetland habitat” , a type of habitat that **already exists** above, in between and below Cannop Ponds ! Removing the dams and ponds would be a heinous act of **ecological and cultural vandalism** by Forestry England.

PAGE 11

“The intermediate options could be designed and implemented to provide defined and measurable amounts of storm water attenuation and ecological enhancements. This could include holding water in a series of smaller in-line and off-line ponds and lakes, some of which might be suitable for fishing. An intermediate option might provide the best balance of quantifiable benefits going forward whilst removing the long-term risks and costs associated with maintaining a registered reservoir.”

The public want both ponds to remain as they are. They don't want a series of smaller ponds, the public won't support any option that changes the two ponds more than is absolutely necessary . The fact FORESTRY ENGLAND mention saving the “costs associated with maintaining a registered reservoir. “ is partly contradicted on page 12 where they say “costs will not be the main driving factor” in the decision process.

PAGE 11

“We do know that whatever the future for the Cannop Valley, it will be designed as one for people to enjoy”

So the site will be 'designed' rather than 'natural'? Man-Made rather than 're-natured' ? Is that not another total contradiction ? Was this plan not supposed to remove centuries of “human intervention” ? Are we in for a kind of “Designer Nature” perhaps? What total hypocrisy...

PAGE 12

“Cost will not be the main driving factor behind any decision – either in an attempt to save money at the cost of choosing the best solution, or as a way of commercialising or generating further income”

On Page 11 FORESTRY ENGLAND have already said the removal of the ponds would be “removing the long-term risks and costs associated with maintaining a registered reservoir” so clearly costs are a primary issue while “the risks”, as we have seen, are debatable . FORESTRY ENGLAND cannot have it both ways.

PAGE 12

“The requirement for maintaining the artificial structures in place at the reservoir will be an ongoing and potentially resource-intensive issue”

Again, they are highlighting cost, after saying it was not the issue. A public asset such as Cannop Ponds should be properly maintained and that will always be at some financial cost, to claim anything else is unrealistic. However the reference to “artificial structures” hardly stands up when the description on page 11 of what FORESTRY ENGLAND propose in its place includes...

“...a natural watercourse that winds through a wetland landscape. ..., connected by a series of **raised walkways, paths and wooden bridges.** “

Are these not “artificial structures” ? Would they not also have a “**requirement for maintaining..**” and become “...**potentially a resource-intensive issue**” ?  
Once again hypocrisy and double standards by FORESTRY ENGLAND , contradicting their own claim.

PAGE 13

“As part of our focus on the future of the Forest of Dean, we have spent the last few years developing “Our Shared Forest” land management plan. Published in 2019, Our Shared Forest sets out an agreed, understood and supported direction for what the Forest will look like, feel like and be like in 100 years’ time. The purpose of the plan was to set a direction for how we manage the Forest going forward, taking into account a diversity of aspects from the woodlands and wildlife to water, geology and cultural and built heritage, as well as how it is used by the community for recreation.”

OUR SHARED FOREST is a land management plan published in 2019 and drawn up with minimal public consultation so cannot be seen as anything other than Forestry England’s own private game plan. Yorkley & District Angling Club have been tenants of Forestry England since 1958 and were not invited to consultation, and they can lay claim to being a significant 'stakeholder' . Also, in that same plan Forestry England claims “Our larger lake systems are all man made...artificially held back by ageing or otherwise vulnerable dams. While we are not proposing to remove these lakes, we will review options to reduce risk and increase ecological values”

What has changed between 2019 and 2022 to warrant a complete about-face on removing the lakes? If OUR SHARED FOREST is the inspiration for the current plans, why are FORESTRY ENGLAND ignoring one of its primary promises?

PAGE 14

“Irrespective of which route is taken at Cannop Ponds, the short-term impact will be significant because the reservoirs will need to be drained for the works to be undertaken. “

The repair option would be the option with the least significant short-term impact, the use of temporary dam systems will prevent the need for a full drain down, the repair option once completed is the option that with the exception of possible changes to spillways will reinstate the ponds as close to how they currently are.

“As a category B Reservoir, Upper Cannop is required to withstand a 1 in 1000-year flood and pass a safety check for a 1 in 10,000-year flood. As a category C reservoir, Lower Cannop is required to withstand a 1 in 150-year flood event. The reason Upper Cannop has a higher classification is because, if it fails it poses a terminal risk to Lower Cannop, which will be overwhelmed by the downstream deluge. This in turn would result in devastating flooding to the downstream communities of Parkend Whitecroft and Lydney. This cannot be allowed to happen.”

The safety checks mentioned above are requirements of the 1975 Reservoirs Act which is the legislation that keeps Dams safe by requiring regular independent inspection and requiring owners of Dams to maintain them. Lower Cannop has been registered under the act and subject to regular inspections for many years, Upper Cannop was only registered under the Act in May 2022. Forestry England have not given a satisfactory explanation as to why the Upper Pond was not previously registered, our belief is that they have registered it simply in order to allow their removal under the Reservoir Act. Stating that the Lower Pond would be overwhelmed by a breach of the Upper pond is pure speculation. Any breach that allows **all of the water** out of the pond in one event in either or both ponds would be unlikely in the extreme. Secondly we have already established that a breach of the Lower Dam carries a low risk and any significant flood is unlikely to reach Parkend. Thirdly Forestry England have stated on several occasions that the ponds “**have a very low level of storm water attenuation in their current form**” what Forestry England have failed to make clear, is that installing water level control mechanisms to the reservoirs such as valves, gates and pumps would be able to provide defined and measurable amounts of storm water attenuation. This would allow water levels in the ponds to be monitored and controlled as circumstances, and indeed the recommendations of the Section 10 report require. FORESTRY ENGLAND has so far failed to respond to this recommendation yet it makes great play of adhering to others of no greater significance. Double standards once again? Cherry-picking the requirements that suit it's purpose?

PAGE 15

“Neither dam was designed or built with flood mitigation in mind. They were built around 200 years ago to provide a reliable supply of water to Parkend Ironworks. Whilst repairs and modifications have been carried out over the decades to prolong the life of the dams, both structures should be viewed as approaching the end of their designed lives”

Forestry England statement here is without historical foundation. The ponds purpose was to provide for a large water wheel in Parkend and it is very likely that the system was in fact designed with various methods of water control (sluices etc) in the first place. That these have fallen into neglect or been removed over the successive 200 years does not alter this and to state the dams can be “Viewed as approaching the end of their designed lives” is plainly unsupported and just convenient speculation, without reference to existing engineering reports

PAGE 16

“The UKs rivers, canals, lakes and ponds are under attack. Non-native plants and species have found their way into our waterways via agricultural use, for ornamental purposes, through water supply transfers and in the case of Cannop Ponds-like- many others partially- as a result of being artificially stocked for angling purposes. These Invasive Non- Native Species (INNS) pose a significant threat to native wildlife through increased predation pressure, introduction and spread of Pathogens, and the loss of genetic integrity through hybridisation”

This statement from Forestry is Inaccurate and misleading Yorkley and District Angling Club have leased the fishing rights since 1958 some 64 years, The fish contained in the ponds are naturally produced UK Native Freshwater Fish species, with the exception of one or two Chinese Grass Carp which introduced the **by the Environment Agency** over 40 years ago in 1982 . The UK native Freshwater species currently present are Brown Trout which are a priority species under the UK Post 2010 Biodiversity Framework, the European Eel which also has the same protection, Sticklebacks, Roach, Rudd, Dace, Chub, Perch, Bream, Tench, Mirror Carp and Common Carp, Cannop Lower contains all the same species as Upper with the addition of Pike which are not present in the Upper Pond, the only fish stocking made by Yorkley & District Angling Club to the Lower Pond in the last 20 years were 27 Carp, 200 Roach and 200 Bream (into a resident population of between 10,000 and 15,000 fish) made in

2017. The movement of fish is strictly by controlled by CEFAS and the Environment Agency including strict Biosecurity rules, Yorkley and District Angling Club are not responsible for introducing any of the Non Native Invasive Species currently in the ponds such as the American Signal Crayfish.

PAGE 16

“By reinstating a natural watercourse in a wetland landscape, we will be working with nature to improve biodiversity by creating vital corridors for aquatic and surface-dwelling wildlife”

You cannot 'reinstate a natural watercourse' from below a pond system that has existed for nearly 200 years. There is nothing there to 'reinstate' naturally. Any so-called regeneration or re-wilding will need to be done artificially by man and machines and therefore cannot be described as a 'natural option'. The ponds are a unique well established natural ecosystem, how can destroying them count as restoring anything? Removal of the dams will be an act of **ecological vandalism** the scars from which could take generations to heal.

PAGE 18

“dam removal has become a more realistic, viable and beneficial approach to river restoration”

As the retaining of water is now said to be critical due to the changing climate, how can removing dams and thus reducing the amount of stored water be justifiable? In a world where the demand for such water is rapidly increasing, FORESTRY ENGLAND appear intent in reducing the capacity of water over which it has control ... hardly a very 'eco' approach? And what about the risk of forest fires (subject of specific FORESTRY ENGLAND on-line posts back in the summer)? If the risk is increasing, as claimed, how can that be reconciled with the intended removal of 'the fire extinguisher' that is Cannop Ponds' current water storage capability ?

PAGE 19

“The Irony is that, 200 years ago functionality was the sole purpose of the pond we know today. We've seen the beauty a wilder, less visibly managed alternative can provide, which is why we are enthused by its potential”

So why wreck it now? You admit it has beauty and has become wilder, don't forget it's taken nearly 200 years to reach the beauty it has today, why spoil

that? To start from scratch means it would take a further 200 years to return to where we already are today. This is illogical.

PAGE 20

“We recognise the Ponds represent a part of the last 200 years of the Forest’s industrial heritage. However, the failing dam structures themselves are a significant part of the heritage. Whether the decision is taken to retain the reservoirs or not, some of this built heritage will have to be sacrificed in our legal obligations to make the dams safe. “

We agree that the dams and ponds are an important part of our industrial heritage, Forestry England’s loud insistence that the dams are failing is both misleading and dishonest. The independent , government-appointed engineer stated in his report that the lower dam is in good condition. If the repair option is taken as required by the engineers report, Forestry England will have the choice of repairing in a manner **sympathetic to its heritage**. In fact if the dams were listed then repairs could only be carried out sympathetically to their heritage and removal of the dams would not be an option.

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“Given the age of the reservoirs ...If an alternative future was pursued and the reservoirs removed, we’d expect to see an array of surprising artefacts cataloguing the Forest’s past. Salvaging these findings would be an invaluable boon to our cultural heritage. Working with a local archaeology group, we would look to capture these hidden treasures to further deepen our understanding of the Forest’s rich cultural history.”

This is complete nonsense. It would be like knocking down Windsor Castle to see if the foundations are Roman. If this proposal were enacted we wonder which “local archaeology group” are going to be recruited ? Firstly they would probabaly want to steer well clear of such an exceptionally unpopular project out of respect for local feeling (which is very strong) and, secondly, why would they be bothering to sift through the silt and debris of the demolished dams and drained reservoirs in which most of the existing heritage has just been destroyed? This would not be a cost-free exercise in itself, archeologists are professionals and as such professional levels of fees are incurred, as anyone working on historic properties will appreciate.



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**“As it stands the dams at Cannop Ponds are not safe”**

Tony Deakin is head of Reservoir Safety for The Environment Agency in an email to Yorkley & District Angling club dated 3<sup>rd</sup> November 2022 he quoted the following: *“I can confirm that the deadline is November 2022. I can confirm that we have been in contact with Forestry England so that this matter can be resolved. I cannot share with you what enforcement actions we may take as this is a legal matter between Forestry England and ourselves. In the meantime, I can also confirm that **Forestry England have made the reservoir safe** and are managing the risks this reservoir poses to the public downstream.”*

PAGE 22

**“Even repairing and replacing what exists - in line with modern reservoir/dam requirements - will require the reservoirs to be drained”**

A full drain down is unnecessary the use of coffer dams or other temporary dam systems will allow water levels to remain whilst works are carried out. This is established and common practice. It appears FORESTRY ENGLAND has not even considered it. Can FORESTRY ENGLAND point to the 'requirements' in the reservoir act that stipulate the need for a complete draining? If not then they should not use it as an excuse. Much the same applies to other claims. FORESTRY ENGLAND is long on headline-grabbing claims and short on suitable evidence and references to back them up. Let them name names, quote reports (and maybe even bolster their argument in the process) , just don't take everyone else for fools and assume that we all believe every word from FORESTRY ENGLAND . We certainly don't .

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**“The picturesque, tranquil aesthetic of the reservoirs as they are might well paint a picture of a natural ecosystem, but what exists is far from the valleys natural state. The reservoirs represent man’s historic disregard for natural processes in favour of rapid industrial development.”**

Yes, we agree ; they are indeed most picturesque and tranquil, and yes, we all KNOW they are a well established, unique ecosystem. But no we don’t agree that they represent 'man’s historic disregard' that’s nonsense. That applies to every town, village, city and structure ever built. To pick on Cannop Ponds as a scapegoat for all human development is laughable. FORESTRY ENGLAND

happily use man-made roads to drive their man-made vans on, to move their enormous man-made tree-cutting machines around the country and send those trees, felled by man-made equipment, back down the same roads to man-made saw mills to create man-made products etc etc. Having been a beneficiary of “rapid industrial development” (it's come a long way from hand saws...) it's extraordinarily fatuous to criticize it.

ALSO...

“Although the reservoirs have been a constant presence for 200 years, they are an industrial intervention that stopped the natural course of the river, and have since been artificially stocked with non-native species for their fishing value.”

This is almost MORE laughable as **FORESTRY ENGLAND themselves** have been financially benefitting from the fishing at Cannop for decades! Yorkley & District Angling Club have leased the site and paid rent since 1958 (64 years). The 10,000-15,000 fish contained in the ponds are naturally produced UK Native Freshwater Fish species, with the exception of one or two Chinese Grass Carp, which were **put there by Environment Agency** in 1982, in an effort to reduce the Invasive “Nuttalls Pond weed”. The Angling Club themselves have removed tonnes of this weed with not even an offer of help from FORESTRY ENGLAND. Does this not sound like more hypocrisy?

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“We would like Cannop valley to perform better for wildlife and particularly aquatic biodiversity, which is why restoring the stream and wetland system is being actively considered.”

The existing ponds are well established unique ecosystems with an abundance of wildlife, Forestry England stating that they would like the Cannop Valley to “perform better for wildlife” shows a complete ignorance of what is already in the valley, which already has riverine/brook habitat above below and in between the two ponds. It already has a marsh/wetland habitat adjacent to where the brook enters each pond in turn. The belief that aquatic biodiversity can be improved by the removal of the ponds is madness. We believe the ponds are performing an essential role in supporting native wildlife, including protected species like bats and otters. Even FORESTRY ENGLAND (on page 28) admits as much. The problem is it cannot keep its story straight for more than a paragraph or two before contradictions keep in. The entire document is riddled with them.

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“It is therefore likely that some or all the fish will need to be moved to another suitable location(s), following appropriate checks for fish health.”

As we have mentioned previously the potential here is for all 10,000-15,00 fish to be condemned to death in the process. Moving fish is heavily regulated. And which suitable location do they have in mind having removed the largest habitat in the area?

PAGE 28 also states ... Of the much vaunted 're-naturing' part of the plan

“It is not possible to determine whether ...(this)... will deliver the range of anticipated ecological benefits”

In plain English they don't actually know, but they are keen to risk our beloved landscape anyway, for an unproven, trendy, buzz-word concept... just in case!

And of the ponds, as an established, working ecological feature, as they now are and how they have been for 200 years FORESTRY ENGLAND says

“Nor can we be sure that the ponds aren't... (already) ...performing an essential role...”

So they admit they could be about to ruin something vital, that we can see works, in order to replace it with some unproven pipe-dream that might not. This is ridiculous. This is risking **'throwing out the baby with the pond water'**, and for what benefit? They cannot even truly say. It's all ifs, buts and maybes. That is completely unacceptable.

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“The reservoirs are part of the industrial heritage of the Forest of Dean. That is why we have commissioned a Heritage Impact Assessment to look at their value and the impacts of any potential options for the reservoirs,”

So, FORESTRY ENGLAND have commissioned a Heritage Impact Assessment? When will this be completed? When will findings be available for public inspection? Without its findings why have they already made comments that appear to indicate that you have no respect for the Heritage and history of the ponds and their Dams?

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“We are listening to what people are saying as we consider the future.”

It is clear that FORESTRY ENGLAND are **not listening** to what people are saying, **41,000 locals** have signed a petition are being ignored, **27 local councillors** have passed a motion that is being ignored, **an elected Member of Parliament** (and a cabinet minister at that) is being ignored and **the 1000 year old Verderers Court**, answerable to every British Monarch since the Norman Conquest, is being ignored.

**To whom are FORESTRY ENGLAND actually listening?**

Please name some of them? They clearly are not locals with any knowledge or cultural ties of the area.

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“The key point is that doing nothing is not an option as at some point the dams will fail, and that is not an eventuality that can be allowed to occur.”

According to part 12 of the 2021 Section 10 dam report (the official redacted Government one, not the ARUP one that has been passed off as the same thing since) “**I consider the dam is in good condition**” and “**I do not consider that the seismic risks are sufficient to pose a significant risk to the dam**” which does not suggest the dams “will fail” . This official report suggests the dams would actually withstand any earthquake likely to occur!

This is the bottom line : **FORESTRY ENGLAND is not telling the truth.**

# #savecannopponds

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