

# FRAMPTON ON SEVERN PARISH COUNCIL

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## Response from Frampton on Severn Parish Council to Local Plan Review

2.3: Our council broadly supports the proposed 'hybrid' strategy, though we feel that too much development is directed at 'Vale' settlements and not enough in the AONB areas. Many 'Vale' settlements are subject to flood risk and we feel that this is not given as much weight as excluding development from AONB sites, which are on the hills and at less risk of flooding.

2.8: Core Policy DCP1: We support the introduction of a policy to achieve carbon neutrality for the district by 2030.

Core Policies 2 and 3 : We support the suggestion of a hierarchy for growth and development across the district. We welcome the change for Frampton on Severn from Tier 2 (in 2015) to Tier 3. However, strategic growth is allocated to Frampton on Severn as a Tier 3a settlement. We feel that Frampton on Severn should be Tier 3b not 3a. Tier 3a settlements are described as 'accessible settlements with local facilities'. The Settlement Role and Function Study, updated 2018, states in its analysis of Table 5:

*"Frampton on Severn, which provides no strategic facilities at all, and is not compensated by a particularly excellent range of "local" services or facilities either".*

This evidence is used to support taking Frampton out of Tier 2 but also applies to Tier 3a. The description of Tier 3a settlements is as follows:

*"These medium-sized and large villages are generally well-connected and accessible places, which provide a good range of local services and facilities for their communities. These villages benefit from their proximity and/or connectivity to higher tier settlements or transport corridors, which enables access to employment and key services and facilities elsewhere, and which may offer some scope for further transport and accessibility improvements."*

In Table 6, on ease of access to key services and facilities, the score for Frampton is 15, defined as 'very poor', putting it in the same category as Cranham, Haresfield, Sheepscombe, Saul and with only 3 settlements worse. The comments below the table are:

*"It is notable that almost all settlements are able to access the key services and facilities within 15 minutes by car. But the contrast between drive times and walking/public transport times for settlements at the bottom of the table (including Oakridge Lynch, Cranham, Haresfield, Frampton on Severn, Sheepscombe and Saul) highlights how car-reliant many of our rural communities are. This is*

*true even of Randwick, which sits very close to the strategic service centres of Stroud and Stonehouse, and which has average drive times to many services and facilities well below 10 minutes.”*

The section of the Settlement Role and Function study allocated to Frampton concludes (p93):

*“Targeting future growth to the Severn peninsula (including the villages of Frampton on Severn, Saul, Longney and Arlingham) would generally offer little opportunity to bring about significant improvements to transport and accessibility, given their remoteness from major transport corridors.”*

This does not tally with a description of an ‘accessible settlement with local facilities’ and one with ‘connectivity to higher tier settlements’. Connectivity with higher tier settlements from Frampton is by car. Walking and cycling is not possible because of distance and safety and bus services are very limited, with routes to Gloucester a couple of times per day but no routes to anywhere else more than a couple of times per week. There are no public transport connections to the local railway stations. The Stroud Sustainable Transport strategy does not consider any settlement west of the A38 apart from Berkeley/Sharpness. Development of Frampton as a settlement will lead to more car use and will be contrary to a policy of achieving carbon neutrality by 2030.

#### Core Policy 3 Section 5.8, The Severn Vale

The section on Whitminster: Site allocations to Whitminster suggest that there is capacity for a further 40 houses. We wish to strongly object to this unless and until major improvements to the sewage system from Whitminster to the Severn outflow and to primary and secondary school allocations are planned in tandem. Sewage from Whitminster is piped along Whitminster Lane to Bridge Rd in Frampton on Severn and thence to the pumping station at Baccabox at the end of Hyde Lane. From there it goes to the treatment station at Fretherne for discharge to the Severn. This foul water system is inadequate for current needs and cannot cope with increased demand. The junction between Whitminster Lane and Bridge Rd has needed pumping out numerous times during the last years and gardens of houses at the north east corner of the Green have been flooded with sewage in the last two months. For a period of about 20 years, Frampton on Severn Parish objected to any development in Whitminster because of these issues. After previous developments, Severn Trent did put in holding tanks in Whitminster which alleviated the situation temporarily and we stopped objecting. However, this only provided temporary relief and we are finding the same problems that we had before. Records should be available from Severn Trent.

Both Whitminster and Lakefield primary schools are full, with waiting lists for places. In the case of Lakefield School, individual classroom capacity is small and it cannot accommodate classes larger than 31/32. The Headteacher is saying that the school is under considerable strain because of overcrowding. Major structural changes would be needed to create a larger capacity school.

The site allocation at Frampton on Severn:

As outlined above, we do not feel that Frampton should be a Tier 3a settlement. However, regardless of its Tier status, we object to the allocation of site PS44 for housing. This site is outside of our current settlement boundary and is not the one allocated for housing in our Community Design Statement. It currently forms a valued open space which separates Frampton Village from Oatfield hamlet and to build on it would blur the distinction between these two settlements and compromise the integrity of the hamlet. The site is crossed by overhead power lines and a public footpath. The site is close to an area where there is frequent flooding from surface water drainage (at the end of Lake Lane) and is a major contributor to it. (Water runs from this field into a ditch at the south side, from there to a culvert below the Recreation Field and then to a drainage system in Lake Lane.) This is inadequate and the manhole covers frequently lift at times of heavy rain. The gardens and sheds of

the houses at the end of Lake Lane have been flooded at least 6 times in the last 5 years, twice in the last 2 months, with houses narrowly missing being flooded more than once. There is existing outline planning permission for building a further 21 houses at this end of Lake Lane, which can only exacerbate the situation. Building in the field between Frampton and Oatfield would need to be accompanied by flood mitigation strategies which not only mitigate the risk of flooding in the new development but also take account of the risk to the wider area. There would also need to be clear lines of responsibility for ongoing maintenance. This is specified in NPPF 155:

*“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere”* and NPPF 163 *“When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere”*.

The site plan displayed at the consultation afternoon in Slimbridge showed access to this site from Oatfield Rd car park. This car park is allocated for Oatfield Rd residents and also doubles as the car park for access to the children’s play area in the Recreation field. It is inappropriate for through traffic to a new housing development. The only other possible access is directly on to Whitminster Lane. Access would be close to the doctor’s surgery entrance and would increase traffic hazard for those accessing the surgery. If the access was placed further from the surgery entrance it would then be close to a sharp bend and be hazardous for that reason. There is currently no footpath or cycle way on this stretch of the lane and it would be essential that these were included in any development, to avoid the irresponsible planning decision currently impacting on the Perryway, where houses were built in a situation where children then have to negotiate a very busy lane without footpath or cycle way in order to get to their school bus or the primary school. In addition to these objections, the objections to the Whitminster development also apply to this site, ie problems with the foul water drainage structure and school infrastructure. It may be felt that most of the above objections might be overcome by various planning restrictions/ requirements. However, we wish to point out that the Lake Lane development for 21 houses has not yet attracted a developer, in fact several developers have shown interest and subsequently pulled out, possibly because the flooding/ sewage requirements for development in Frampton deter them from going ahead. There is a risk that the local plan under delivers on housing allocation if sites are allocated which are then subsequently not developed because of the challenges that they present.

Finally, we wish to point out that we have suggested sites for both employment and housing in our Community Design Statement. Employment land was suggested at Fromebridge, next to the A38 on the north side of the B4071. It was suggested that the Old Dairy was a possible site for low cost housing. (The analysis of Frampton settlement suggests that low cost rather than high cost housing is needed in the village). The Old Dairy offers a brownfield site close to the Whitminster Lane cricket field and within safe walking distance of the local shop, school, GP surgery and bus stops. We have reason to believe that, although the landowner is not currently advertising this land for development, this position could change within the timeframe of the revised local plan and that low cost housing would be a priority on this site.

As many of the planning reports for SDC state, Frampton on Severn is geographically constrained for future development. There are rivers on 3 sides of the parish and parts of the west of the parish are in Flood Zone 3. Large parts of the village are in the Frampton Conservation Area and this contains many houses of historical importance. The infrastructure for the village is under great strain. New development needs to be accompanied by improvements in the foul water system, the drainage system, in school provision, in footpaths/ cycle paths and in public transport.

Environment and Surroundings:

We welcome the Policies outlined in Core Policies 14 and 15 and most of the delivery policies associated with them. We would welcome addition in ES3 of a policy on noise from marquees at antisocial hours. We have concerns about the exact locations of potential solar and wind turbine placements. Your allocation of renewable energy wind sites appears to include the west side of The Green and also the Narles, both in Frampton Conservation Area and designated as important open spaces in the Frampton Conservation Area statement. We assume that this is a mistake. The allocation of solar energy sites appears to allow solar energy development next to the Severn Estuary Ramsar site, where there would be implications for the impact on birds visiting this site.

Chair

On behalf of Frampton on Severn Parish Council

13/1/20