

FRAMPTON ON SEVERN PARISH COUNCIL

Mrs Sheila Murray,
Clerk

Mr. P. Burnside, Chair

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To: Planning Inspector, Stroud Local Plan Review
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Stroud District Council Planning Department.

Dear Sir/ Madam

Frampton on Severn Parish Council is objecting to the proposals for our parish in the local plan review, specifically the allocation of a site for housing behind Oatfield Road, site PS44 and its access as specified in the review. Our grounds for objection are as follows:

1. The site is outside of our current settlement boundary.
2. The site is not the site for residential housing specified in our Community Design Statement, adopted in 2018 by Stroud District Council (attached). No housing has been allocated to the site that we had identified, which, unlike this site, is a brownfield site. ('Housing', p14 para 11). This site was assessed by planners and could accommodate a similar number of houses to the Oatfield site.
3. The Oatfield site was designated an 'Open space' in our Community Design Statement. ('Open Spaces', p. 25 item 4)
4. The designation of this site as Flood Zone 1 reflects its distance from the two adjacent rivers but it would be misleading to assume that it is therefore safe from flooding. The site acts as vital flood attenuation, protecting residential areas within the village from flooding frequently. However, during periods of heavy rain fall this flood water causes flooding to adjacent parts of the settlement. The area which floods most frequently is the area proposed for housing. See photographs below.
5. The proposed access to the site is through the middle of the car park for the Children's Play Area. Changing the highway from a cul-de-sac to a through road will dramatically increase vehicle speeds and traffic volume, resulting in significant safety hazards to children using the playground.
6. The site contains overhead power lines. Given the potential health risks associated with living near high voltage overhead power lines these would need to be moved, preferably buried.
7. There is a popular and well used public footpath which crosses the proposed site. Any proposed development layout would need to maintain a public footpath on a similar alignment.
8. With the effects of global warming now being seriously considered by policy makers across the world, land which has clear historical evidence of frequent flooding should never be considered for residential development. Robust effective mitigation measures are often so costly that developments do not go ahead and when they do, they often compromise important objectives such as the allocation of low cost housing. This has already been demonstrated in Frampton on Severn where a previous allocation of land, which was susceptible to flooding, still remains undeveloped. In this case four developers have failed to make this plot of land a viable commercial proposition.

Expanding further on these points, we realise that, unlike a Neighbourhood Development Plan, a Community Design Statement does not have statutory guidance status. However, Stroud District Council has promised to respect the wishes of parishes as stated in their design statements. This statement was adopted by Stroud District Council in November 2018, with an introduction by the Leader of Stroud District Council. The site for housing identified by Frampton Parish Council in its Design Statement is also outside of the settlement boundary. However, unlike the proposed site, it is a brownfield site, it does not flood and it has safer access to the village. The Design Statement also emphasises both the contribution of open spaces and flood meadows to the parish of Frampton on Severn. When developing the Community Design Statement we engaged heavily with village residents and 89% of our survey respondents felt that the statement "Open spaces, open views, mature trees and hedges give Frampton parish its character and should be preserved", was either important or very important to them. A similar percentage of respondents felt that 'Open Views' were important or very important and that the open spaces and views give the parish its character. In this regard, the open space at Oatfield creates a demarcation between the main village and the hamlet of Oatfield, which could easily be lost if building is allowed in this area.

On Pages 10 to 12 of The Community Design Statement there is a section on Tidal and Fluvial Management which explains how the canal bank is designated as a flood defence by the Environment Agency. However, this canal also acts as a barrier to surface water draining from the east side of the canal. Surface water runs under the canal through a system of siphons and tidal flaps, which are closed off at times of very high tides. If there is a high level of surface water at a time of very high levels in the River Severn, water is trapped to the east of the Canal (on the proposed site), where it is slowly dissipated through the drainage system. Within the village there are several areas which act as flood reservoirs, such as this flood meadow. Building at this location will not only have consequences for the new houses but also for the surrounding neighbourhood. The Community Design Statement gives clear warnings about the risks of building in such areas.



Photographs showing extensive surface flooding, attenuating surface run off and protecting properties.



Photograph showing flooding to the rear of Frampton Surgery, a regular occurrence in winter months.

The water from this field flows into a ditch, before passing through a culvert and into the Lake Lane storm drainage system. The residents of Lake Lane have experienced more than 10 incidents of flooding in the last five years and the majority of these have been the result of heavy rainfall from the Oatfield area, overwhelming the drainage system at Lake Lane. Any developer on the Oatfield site would have to include flood mitigation measures for the new houses and would also have to ensure that increased surface run off from the development does not cause any flooding in other areas of the village.

Within the National Planning Policy Framework (NPPF 2019 version 3) paragraphs 155 to 158 state the following:

“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.

156. Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.

157. All plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of climate change, – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:

- a) applying the sequential test and then, if necessary, the exception test as set out below;*
- b) safeguarding land from development that is required, or likely to be required, for current or future flood management;*
- c) using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques).*
- d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.*

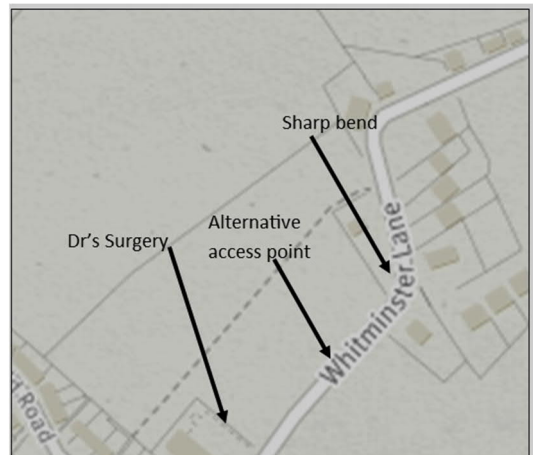
158. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding”

We have suggested a better site to Stroud District Council which does not flood and is on brownfield land. The site proposed in the new Draft Local Plan poses a far higher risk, both in terms of local flooding and impact on other parts of the parish. It therefore fails the sequential test and is contrary to the provisions set out in paragraphs 155 – 158 of the NPPF.

The county flood officer, along with representatives from the Inland Drainage Board and Severn Trent Water are currently investigating the storm and sewage drainage systems within the parish, after a significant increase in the frequency of flooding events. These incidents are caused by an overwhelming of the drainage infrastructure across various parts of the village. Our main public open space, The Green, has been flooded with sewage at least three times this year. Other parts of the village have experienced flash flooding which, as discussed earlier, are directly related to the Oatfield site. In the light of this, it seems perverse that the district planners are proposing to allocate a site for housing which regularly floods, and where any development would have major impacts on what is already a very delicate drainage system.

The proposed access to the site is through the car park for the Children’s Play Area. As discussed earlier this will significantly increase safety hazards for children using the playground. In addition to this, there is little in the way of off-street parking in this area, particularly along Oatfield Road itself where it is effectively

reduced to a single lane along its full length. The parking area next to the Children's Play Area, also serves as parking for adjacent houses. As you will see from the plan below there is little space available to adjust the horizontal alignments of the road, so a sharp right turn will be required with parking bays sacrificed to provide the necessary visibility splays. The alternative would be to install an access off Whitminster Lane, however we feel that the close proximity of the sharp bend, the entrance to Frampton Surgery and the entrance to the Youth Football Club would make this almost as hazardous.



Plans showing limited space at the proposed Oatfield Road access, and an alternative on Whitminster Lane.

Having failed to consider the historic flooding events in this area, this draft proposal does not appear to consider any real local knowledge, and suggests that the location has been chosen solely on the results of a desktop study. In the light of the objections raised, we ask that Stroud District Council revise its local plan to exclude the Oatfield site from proposed housing development. Should the proposal remain within the proposed review, we ask the inspector to rule the site inappropriate, in line with the National Planning Policy Framework paragraphs quoted above.

Yours sincerely

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Paul Burnside, Chair

On behalf of Frampton on Severn Parish Council