



Appeal Decision

Inquiry held on 10 – 12 September 2025 and 16 - 17 September 2025

Unaccompanied site visits made on 9, 17 and 18 September 2025

by **C Coyne BA (Hons) DipTP MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 8th December 2025

Appeal Ref: APP/C1625/W/25/3365253

Land at Whitminster Lane, Frampton-on-Severn, Gloucestershire GL2 7HP

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant outline planning permission.
 - The appeal is made by Seven Capital plc against the decision of Stroud District Council.
 - The application Ref is S.22/0285/OUT.
 - The development proposed is outline application for the construction of up to 80 dwellings and ancillary works with all matters reserved except access.
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Decision

1. The appeal is dismissed.

Preliminary Matters

2. The planning application which is the subject of the appeal was for outline planning permission, with all matters except for the access reserved for future consideration. An indicative set of plans were submitted with the application, and I have taken these into account only in so far as determining the acceptability, in land use principle terms, of erecting up to 80 dwellings on the site.
3. Land associated with the proposal is allocated for 30 dwellings in the emerging Stroud District Local Plan Review Pre-Submission Draft Plan¹ (SDLPR). This plan has been submitted for examination, but the examination is currently paused. I therefore afford any conflict with the emerging draft plan limited weight in the planning balance.
4. A Case Management Conference was held on 9 July 2025. The purpose of the conference was to provide a structure for the ongoing management of the case and the presentation of evidence. There was no discussion of the merits of the respective parties' cases.
5. At the Inquiry the matter of ecological impact was discussed, as was the nature of the Council's and Natural England's initial objections to the proposal on these grounds. The outcome of this discussion was that, as set out in the evidence², the Council is now satisfied that proposal's potential impact on Ecology could be adequately mitigated via the imposition of suitably worded planning conditions and the implementation of the relevant s106 legal agreement. Consequently, the

¹ Core Document E.3

² Council's Ecology Proof of Evidence.

Council did not seek to defend the fourth, fifth, sixth and seventh reasons for refusal. In addition, and in light of this information Natural England has since withdrawn its objection to the proposal as set out in its correspondence³. Therefore, it has not been necessary to consider this matter any further.

6. Before me are two signed and dated Section 106 legal agreements, one with the Stroud District Council and one with Gloucestershire County Council. They make various provisions which include: affordable housing, library services, education provision, and environmental and ecological mitigation measures. The Council has confirmed that these overcome its concerns in respect of the eighth and ninth reasons for refusal. However, as I am dismissing for other reasons, it is not necessary for me to consider these obligations in great detail.
7. In their respective submitted evidence relating to the planning balance, both main parties have ascribed terms for the weight they give to harms and benefits using differing scales. For the avoidance of doubt and bearing these scales in mind I have ascribed weight in my reasoning below based on the following scale in ascending order: no weight, limited, moderate, substantial, very substantial.

Main Issues

8. In the context of the above the main issues are:
 - whether the proposed development would be consistent with the scale and function of the settlement of Frampton-on-Severn (Frampton);
 - the effect of the proposed development on the character and appearance of the area and its landscape; and
 - whether the proposed development would preserve or enhance the character or appearance of the Stroud District Industrial Heritage Conservation Area (IHCA), the Frampton Conservation Area (FCA), the Saul Conservation Area (SCA) and the Gloucester and Sharpness Canal (Ship Canal).

Reasons

9. The site is situated in a field at the edge of Frampton, a village nestled within the Gloucestershire countryside near to the River Severn and not far from the M5 motorway. The market town of Stroud is also not very far away. The site is also located outside the settlement limits for Frampton, in open countryside, for planning policy purposes.

Scale and function of settlement

10. Core Policy CP1 of the adopted Stroud District Local Plan (SDLP)⁴ outlines a positive approach to considering development proposals that reflects the presumption in favour of development as set out in the National Planning Policy Framework (the Framework).
11. Core Policy CP2 of the SDLP identifies locations in the District for strategic growth and stipulates that development outside of these strategic sites will be in accordance with the settlement hierarchy set out in the Plan. Both main parties

³ Inquiry Documents I.7, I.8 and I.9

⁴ Core Document E.3

agree that proposal would conflict with Policy CP2 as the appeal site is located outside of the defined settlements as set out in Core Policy CP3 of the SDLP.

12. On sites like this one, beyond the defined settlement limits, Policy CP15 of the SDLP seeks to restrict development and specifies certain principles that should be complied with such as it involving essential community facilities.
13. Frampton is categorised by Core Policy CP3 of the SDLP as being a second-tier settlement or Local Service Centre. The policy states that these settlements can support sustainable patterns of living because of their current levels of facilities, services and employment opportunities. Emerging Core Policy 3 of the SDLPR designates Frampton as a Tier 3a settlement. It states that these settlements are generally well-connected and accessible places which provide a good range of local services and facilities.
14. The Council highlight⁵ the fact that a settlement classification review (the review)⁶ was undertaken as part of the evidence base for the examination of the emerging SDLPR with the result being that it in effect 'demotes' Frampton from a second-tier settlement to a tier 3a settlement due to it having poor access to strategic services and facilities. Indeed, the review states that in overall terms the settlement has very poor accessibility with strong local services and facilities, basic local retail provision and no strategic services, facilities or retail provision. It also states that Frampton has very poor access to services and facilities elsewhere due to poor public transport links related to infrequent services and a lack of connectivity.
15. The Settlement Role and Function Study update (the study)⁷, which also formed part of the evidence base for the SDLPR, highlights that all the current tier 2 settlements in the SDLP perform relatively well in terms of both strategic and local services and facilities, except for Frampton. This is because it has no strategic services or facilities at all which are not 'compensated' for by a 'particularly excellent' range of local services or facilities.
16. The study's purpose is to understand how towns and villages in the District work and function, to set a strategy for determining the pattern, scale and nature of future development and inform future actions to deliver positive outcomes for local communities. In addition, although lack of accessibility of Frampton to services and facilities was not a distinct reason for refusal, it is clear from the study itself that accessibility to services and facilities is a key factor in its analysis of the role and function of settlements within the District.
17. Consequently, I consider that Frampton's accessibility to services and facilities to be a key component to understanding its role and function as a settlement. Furthermore, based on the evidence, I also consider the 'demotion' of Frampton to be understandable, reflecting its poor access to a higher-level settlement's strategic services and facilities compared with other villages. Furthermore,
18. I acknowledge that there are several key services and facilities within the village itself, namely a GP surgery, primary school, village shop, post office, public houses and sports clubs as I saw on my visits. However, these are primarily local services and facilities which do not, in and of themselves, negate the fact that the village still has very poor accessibility to other strategic services and facilities with it being

⁵ Proof of Evidence – Conrad Moore

⁶ Examination Library Document EB123

⁷ Core Document E.40

reliant on other larger service centres for these, such as Stroud. Indeed, the study shows at table 6 that it would be impossible/unrealistic to access a pharmacy or an accident and emergency department or minor injuries unit using public transport from Frampton⁸. Moreover, the study gives Frampton an overall accessibility score of 15 and an overall accessibility rating of 'very poor' meaning that it is 6th from bottom in the ranking of settlements.

19. I am also aware that the GP surgery and primary school serve a catchment area much wider than Frampton, which, on the face of it, suggests that it would be capable of supporting more growth. However, that is not the same as the village being in an accessible location for people to make use of all its services and facilities from other settlements outside it or vice versa. The study also rates the local retail provision as basic with there being no strategic retail services available at all.
20. Another key component to Frampton's role and function as a settlement is in relation to the levels of employment and economic activity within it. The study highlights that Frampton has a small but healthy employment role, with there being a key employment site within the village and about 800 jobs available locally. This equates to slightly more than one job available for every economically active resident, making Frampton a modest net importer of workers. That said, the study also shows that the proportionate housing growth for Frampton between 2011 and 2018 was circa 3% equating to 18 new dwellings and that this is very low housing growth in comparison with other tier-2 settlements, and well below the average District-wide housing growth rate of 6%.
21. In relation to a 'case for growth' for Frampton, the study concludes that the village would benefit from some planned development that was targeted and scaled to meet local housing needs to help tackle housing unaffordability, and to maintain diversity and demographic vitality. The study does however, go on to state that 'considerable growth and development may be unrealistic given its environmental constraints (such as extensive areas of floodplain) and its poor accessibility'. It adds that targeting growth here would offer little opportunity to bring about significant improvements to transport and accessibility, given its remoteness from major transport corridors.
22. In the context of the above, and from the evidence before me including what I have observed on my visits, it is very clear that Frampton is not well-served by public transport and that the services and facilities located within it are highly localised. This means that existing and future residents of the village cannot and will not be able to access strategic facilities and services via public transport. It is therefore also evident that for this reason Frampton is not a sustainable location for housing growth on the scale outlined by the proposal.
23. Consequently, given Frampton's very poor accessibility, related limited capacity for growth and historically low housing growth rate the scale of the proposal would be disproportionate to the role and function of the village. In other words, while the site could accommodate 80 dwellings, the reality would likely be that the proposal's residents would not be able to easily access strategic services and facilities outside the village without relying on a private car.

⁸ Core Document E.40 page 34

24. As a result, I conclude that the proposal would not be consistent with the scale and function of the settlement of Frampton. It would therefore conflict with core policies CP1, CP2, CP3 and CP15 of the SDLP. It would also therefore conflict with Core Policy CP3 of the SDLPR.

Character, Appearance and Landscape

25. The findings of the submitted Landscape and Visual Impact Assessment⁹ (LVIA) are not in dispute. It found that in terms of landscape impact, there would be a short-term major to moderate adverse effect on the appeal site which could be mitigated to a moderate adverse effect in the longer-term once landscape and green infrastructure mitigation measures mature after a 15-year period.
26. The LVIA also identifies limited range moderate to minor short-term adverse landscape effects at a local level on the settlement and the wider setting of the Lowland Plan Landscape Character Type which would reduce to minor adverse effects in the long-term i.e. after 15 years.
27. Visually, the LVIA identifies short-term major to moderate adverse effects from various viewpoints that reduce to moderate adverse in the long-term (views 2,3 and 5) and moderate to minor adverse short-term effects that reduce to minor adverse effects in the long-term. It also identifies one major to moderate adverse short and long-term effect from viewpoint 1 which is where the proposed access would be located.
28. The Council accepted that their preferred option of around 30 dwellings on the site, as per the emerging draft plan allocation, would likely have an adverse impact on the landscape and character of the area but no substantive evidence has been submitted to support this.
29. In any event, the main parties agree that, since the emerging draft plan is currently being independently examined and that this process is currently paused, any conflict with its policies should only carry limited weight. From the evidence before me I see no reason to disagree. Accordingly, I afford the emerging policies limited weight.
30. The Frampton Conservation Area Statement¹⁰ (FCAS) states that the topography and landscape of the land around the village is 'largely flat' and that it remains 'overwhelmingly rural'. Indeed, as acknowledged in the appellant's heritage proof of evidence the appeal site lies within the wider countryside beyond the Ship Canal.
31. Policy ES7 of the SDLP requires the use of the Stroud District Landscape Assessment when determining applications for development within rural areas. The Landscape Sensitivity Assessment (LSA)¹¹ identifies the green gap between Frampton and Oatfield as a sensitivity within the local landscape. However, it also acknowledges the potential for the development of land north of Whitminster Lane while taking account of powerlines and the setting of the Gloucester and Sharpness Canal. The LVIA also points out that the LSA identifies the functional gap between Frampton and Oatfield as a key characteristic.

⁹ Core Document A.15

¹⁰ Core Document E.5

¹¹ Core Document E.27

32. The LVIA also highlights that the landscape surrounding Frampton forms part of a rolling agricultural plain and that the site is relatively flat with its north-east boundary being aligned with the gardens of properties at Oatfield. The FCAS also states that the low-lying nature of the landscape, and the general lack of high walls and fences in the gardens make the buildings in the village prominent within the landscape. I also observed this on site, and consequently, I consider the character of the area to be intrinsically rural despite the obvious links to its canal-based industrial past and the present-day business and industrial activity taking place in Frampton.
33. The site is currently undeveloped, open and rural in character. It forms a spatial and visual gap between the settlements of Frampton and Oatfield with links to the open land further beyond it towards Church Lane and the open sports field on the other side of Whitminster Lane. That said, there are some large industrial buildings beyond one corner of the appeal site at the junction of Church Lane and the Sandfield Bridge which are related to the Sandfield Mill. These do have a denser more built form like those further down the canal near to Fretherne Bridge. However, they do not extend far from the canal side, and they are not very tall apart from the 1950's mill building itself which can be seen from a good distance away, for example from Fretherne Bridge as I saw in my visit.
34. From the evidence before me and what I saw on the stretch of the ship canal between Sandfield Bridge and Fretherne Bridge there are two main pockets of industrial and residential buildings, one larger than the other, which are set within an overwhelmingly rural landscape. The evidence also clearly shows that the site and land next to it forms the unmistakable spatial and visual gap between these two pockets of built development. The site also forms the open gap between the industrial buildings at Sandfield Mill and the houses at Oatfield.
35. This gap is spatially and visually important because the juxtaposition of industry with agriculture and the natural environment. This is a key theme of the IHCA¹² and its setting and given the low-lying nature of the landscape which is dominated by the sky and where buildings are prominent¹³. As a result, while I acknowledge that it is not formally designated in relation to its landscape or heritage value from what I have seen, read and heard I do consider the site to be a very important part of the local rural landscape by maintaining a functional open gap which reflects and maintains its key characteristics of this landscape.
36. The indicative proposal would introduce a large housing development onto the site and these buildings would be visually prominent in the landscape. As such I consider the magnitude of change that the proposal would bring about to the site and to Whitminster Lane to be significant. Consequently, the proposal would have a clearly adverse impact on the intrinsic rural character of the site and local landscape.
37. Furthermore, according to the indicative layout there would only be a gap of about 10 metres between the proposed housing and the industrial buildings at Sandfield Mill. The indicative layout plan also shows that the remaining open green gap between the proposal's built form and that of Oatfield would be irregular with a very small distance between them particularly between plot 66 and Oatfield Cottage.

¹² CAS

¹³ FCAS

38. Moreover, the area of the site proposed to be allocated by draft Policy PS44 of the SDLPR would also appear to be smaller than the appeal site with its boundary being tapered in at an angle so that it narrows towards Whitminster Lane as shown on the addendum to the agreed Statement of Common Ground¹⁴ (SoCG). The boundary of the draft allocation would also appear to be further away from the industrial buildings at Sandfield Mill meaning that there would be a wider gap between it and the hamlet of Oatfield when compared to the site.
39. The proposed gap, in my view, would not be enough to maintain the important visual, spatial and functional space between the two settlements of Frampton and Oatfield. Furthermore, as a result, the proposal would have an unacceptable adverse effect on the functionality of the existing gap in terms of avoiding the coalescence of Frampton and Oatfield.
40. The appellant argues that the proposal would only marginally exceed the area of proposed draft allocation PS44 citing inquiry document I.6 as evidence for this. However, the fact remains that this document shows that there would still be a much smaller gap between the site boundary of the draft allocation and the industrial buildings at Sandfield Mill, than that of the site (which abuts them). Moreover, it is also evident from document I.6 that the gap between any built development on the site and the houses at Oatfield would also be much less than the likely gap between any built development on the draft allocation and those same houses. In any event, the draft allocation is just that and it has not formed a significant part of my consideration of this case given the current status of the SDLPR.
41. The appellant acknowledges that there would be a clear visual impact arising from the proposal as seen from viewpoint 1 as set out in the LVIA and as they rightly state *'to state the obvious, if one were to stand at the entrance of a housing estate, then one will see a housing estate'*¹⁵. Furthermore, while the visual impact would likely be mitigated after a period of time once the landscaping and Green Infrastructure features had matured, the adverse spatial impact on the character of the landscape would not be so mitigated. Additionally, as set out in the LVIA, any proposed landscaping and GI features would take about 15 years to mature and provide any benefit in terms of mitigating any adverse visual impact. Consequently, I consider that the proposal would for the most part be visible from the public highway on Whitminster Lane for a considerable period, nonetheless.
42. The appellant has also stated that the Strategic Assessment of Land Availability New Sites Update Report 2018 (SALA)¹⁶ shows that the appeal site could accommodate 80 dwellings without unacceptable landscape character harm. However, the SALA heritage impact appraisal for site FRA004 observes that the site forms part of the setting of the Ship Canal and that in turn this canal forms part of the setting and historic and landscape context of the IHCA, FCA and SCA and that its development risks the coalescence of Frampton with Oatfield and the loss of a significant gap which contributes to the character and context of the canal network.
43. I therefore conclude that the proposal would cause very substantial harm to the character and appearance of the area and its landscape initially and substantial

¹⁴ Inquiry Document I.6

¹⁵ Appellant's closing arguments

¹⁶ Core Documents E.13 and E.14a

harm in this regard after a 15 year period. As a result, the proposal would conflict with Policy ES7 of the SDLP.

Heritage Assets

IHCA

44. The IHCA Conservation Area Statement¹⁷ (CAS) identifies one of the key themes of the IHCA's special interest as being the juxtaposition of industry with agriculture and the natural environment and highlights the differences in the character of the western part of the study area (the Vale) and the eastern and southern parts (the Valleys) in terms of the buildings, typical materials and shape of the landscape.
45. The site and the surrounding area is located within the western part i.e. the Vale. The IHCA then breaks down the overall study area into character types. The part of the IHCA closest to the appeal site is identified by the CAS as being part of the Rural Frome Vale Green Corridor, Saul Junction and Core Vale Settlement character types.
46. The CAS states that the lower Frome corridor is characterised by its open rolling landscape which broadens out towards the Severn. It also clearly highlights that much of the character around Saul Junction where the Stroudwater Navigation and Gloucester and Sharpness Ship Canal meet is airy and open because the ship canal is wider and more open than the others in the study area. Indeed, from what I saw on my visits, the area around Saul Junction does have an open feel to it particularly when experienced in conjunction with the nearby marina. This was particularly apparent from vantage points near the swing bridge and the Junction Bridge House where the ship canal's width is noticeable.
47. Therefore, based on the above I consider that the significance of the IHCA at Saul Junction is derived from both its industrial past but also the relatively open and rural landscape that surrounds it here.
48. Given its open and rural nature and its proximity to the industrial development at Frampton I consider that the appeal site makes a positive contribution to the setting of the IHCA and the juxtaposition of industry with agriculture and the natural environment. I therefore also consider that the site makes a positive contribution to the significance of the IHCA. As set out above, the proposal would introduce what in effect would be a large new housing estate into this green gap by largely infilling the site, leaving a much smaller strip of open land than what is there currently.
49. On my visits, I saw that the site along with the open field between it and the IHCA form part of a relatively open landscape meaning that the proposal would likely be at least partially visible from the boundary of the IHCA at Church Lane. The proposal would therefore have an impact on the view out from within the IHCA. Similarly, there would also likely be at least some impact from the proposal on views into the IHCA from the end of Oatfield Road, the neighbouring play area, the site itself and from the public right of way within it.
50. The proposal would therefore also have an adverse impact on one of the key features of the IHCA's setting by largely removing an open greenfield site, located beside industrial buildings, which clearly contributes to the juxtaposition of industry with agriculture and the natural environment within the surrounding landscape.

¹⁷ Core Documents E.29, E.30, E.31

Moreover, this adverse impact would be compounded by the replacement of the open greenfield site with a modern housing estate and its associated roads and infrastructure.

51. I consider that the openness of the site is visually and spatially connected to the openness of the field between the boundary of the IHCA and the site. In my view this means that it contributes at least in some way to the setting of the IHCA and that this can be experienced from Sandfield Road/Church Lane. Moreover, the appellant acknowledges that the proposal '*will bring the housing that can be experienced from the short section of the IHCA along Sandfield Road closer toward the observer*' in their proof of evidence. Therefore, set within this context, it is self-evident that the proposal would have a detrimental impact on this openness and therefore the setting and significance of the IHCA.
52. Consequently, I find that the proposal would have an adverse impact on the setting and significance of the IHCA. As a result, it would fail to preserve its character thereby causing less than substantial harm at the lower end of the scale.

FCA

53. As set out in the FCAS the character of the village has been shaped by many factors including history, economics and land use. A key factor in the historical development of the settlement was the construction of the Gloucester and Sharpness ship canal which was created to allow cargo and other ships to avoid the more dangerous tidal waters of the Severn. This in turn allowed the transportation of goods such as chocolate along the canal which led to the establishment of a Cadbury's factory which produced chocolate crumb for transportation to Bournville to be made into chocolate. The FCAS goes on to highlight that this also led to housing being built with the village continuing to expand until the closure of the factory in 1983.
54. The FCAS also highlights that in visual terms the landscape surrounding the settlement influences first impressions on approaching the village with the local topography forming a significant component of views and vistas in and out of it. In addition, as acknowledged by the appellant, it states that the land immediately around the village is '*largely flat*' and '*dominated by the sky*'.
55. As already mentioned above the FCAS also highlights that the low-lying nature of the landscape, and the general lack of high walls and fences in the gardens make the buildings in the area prominent. It would reasonably follow that the same would apply to the site given that the various Conservation Area Statements and other evidence before me all say that broadly speaking the landscape around Frampton is largely open, flat and rural.
56. That said, I did see on my visit that from several vantage points within the FCA, closest to the site, such as Fretherne Bridge, that the site was visually almost completely obscured by the mature trees, vegetation and buildings on the site boundary adjacent to the tennis courts, as also shown by plates 1 and 2 of the appellant's proof of evidence.
57. However, in terms of views into the FCA, I saw that the appeal site was however, at least partially visible from Sandfield Bridge and the towpath as shown by Plates 6 and 7 of the appellant's heritage proof of evidence. While I note the appellant's point that the land immediately next to the corner of the site currently has large

storage containers in situ and that these have by their account been there for quite some time, it is by no means certain that they would remain there indefinitely.

58. The appellant argues that the site is, in their view, located beyond the setting of the FCA meaning that it makes '*no contribution to the significance of the village*'. However, given the appeal sites proximity to the boundary of the FCA, the fact that it abuts the Ship Canal (the historic significance of which is linked to the FCA) and the visual link between them facilitated by the towpath (via which users will experience them), I find it difficult to see how this can be the case. Indeed, the appellant states in their proof of evidence that the settings of the three conservation areas and the Ship Canal overlap and are interrelated.¹⁸
59. Consequently, I find that the proposal, given its prominence, would have an adverse impact on the setting and significance of the FCA. As a result, it would fail to preserve its character thereby causing less than substantial harm at the lower end of the scale.

SCA

60. As set out in the appellant's heritage proof of evidence, Saul village and the SCA are situated within an agricultural landscape which surrounds them apart from where the FCA abuts the Ship Canal and the nearby industrial buildings at Sandfield Bridge and Frampton. It also states that this rural setting makes a positive contribution to the significance of the SCA. It also highlights that the Ship Canal and the Stroudwater Navigation Canal form key aspects of the setting of the SCA.
61. While I note the appellant's point that the appeal site does not contribute visually to the significance or character of the SCA, this is not the same as the site not making any contribution at all. Indeed, the appellant's proof acknowledges that the appeal site makes a 'slight positive contribution' to the significance of the SCA.
62. Consequently, in the context of the above the proposal and subsequent loss of most of the appeal site's spatial and visual openness would have at least some harmful impact on the setting and significance of the SCA by developing the site.
63. I therefore conclude that the proposal would have an adverse impact on the setting and significance of the SCA. As a result, it would fail to preserve its character thereby causing less than substantial harm but at the lowest end of the scale.

Gloucester and Sharpness Canal

64. As mentioned above the Gloucester and Sharpness Ship Canal (the Ship Canal) is characterised by the general openness and rurality of the landscape around it and the lack of development on its banks. Indeed, the CAS describes it as being extremely wide with its airy, open character being in marked contrast to the other two canals within the IHCA study area. Its historical interest and significance is derived from both its industrial past and its open and rural character.
65. Therefore, while I note that there is a fair amount of development on the bank of the Ship Canal at Frampton, there are as outlined above, historical reasons for this and because of this development, the visual, spatial and functional gap that the site provides contributes to the juxtaposition of open rural landscapes and industrial

¹⁸ Appellant's heritage proof of evidence paragraph 4.25

development which is a key theme of the IHCA's special interest as set out in the CAS.

66. The site therefore makes a positive contribution to the setting of the ship canal as acknowledged by the appellant. Furthermore, while I acknowledge that the ship canal is a non-designated heritage asset with a considerable length and that this has a bearing on its interrelationship with the wider landscape, it is reasonable to also assess any impact on its setting in a more local context in relation to the appeal site. It follows therefore that it would also be reasonable for me to assess any potential local impact on its setting and significance that would be caused by the proposal.
67. The appellant argues that given the location of the appeal site next to the Ship Canal, it makes a limited positive contribution to its significance when experienced from that part of the towpath when considered within the wider significance of the Ship Canal as a whole i.e. along the entirety of its length, which according to the evidence is about 17 miles.
68. However, as I have set out above, the proposal relates to the appeal site and while any potential impact it would have on the significance of the Ship Canal as a whole can and should be considered, it would be remiss of me not to also consider any potential locally specific impact it would have on the Ship Canal's significance where it runs past the site. In my judgement, this seems a wholly reasonable and logical thing to do. Moreover, the entirety of the Ship Canal could not reasonably be expected to be interpreted or indeed experienced by someone all in one go.
69. The main parties agree that the Ship Canal's heritage interest is significant and that the proposal would cause less than substantial harm. There is however disagreement as to where on the relevant scale this less than substantial harm sits, at the low end or in the middle.
70. The proposal would be very clearly visible from the Ship Canal towpath directly opposite the appeal site even with the proposed buffer of an open strip of undeveloped land between the site and the canal. Furthermore, given its scale, I consider that the proposed housing would also be very visually prominent in the local low-lying landscape with its built form being extremely dominant in the skyline.
71. Consequently, in the context of the above, and given the appeal site's proximity to the Ship Canal and its current open and rural character set within a low-lying landscape, I consider that the proposal, would have an adverse impact on the setting, significance and historic interpretation of the non-designated heritage asset. I therefore conclude that the proposal would fail to preserve its character thereby causing less than substantial harm in the middle of the scale.

Conclusion on heritage assets

72. As set out in the appellant's heritage proof of evidence the Ship Canal and the Stroudwater Navigation, which is part of the IHCA, are interrelated industrial heritage features. In addition, and taking this context into account, I consider that the FCA and SCA, given their proximity to the historic canals and Saul Junction, where they intersect, also form part of the wider historical landscape of the area and its setting.

73. Moreover, as set out above given the appeal site's location and proximity to these heritage assets and its rural and open character and appearance I consider that it makes a positive contribution to the settings of the FCA, SCA, IHCA and the Ship Canal.
74. Furthermore, as acknowledged in the appellant's proofs of evidence, the character of the landscape around Frampton, including the site is rural and it is also acknowledged that this rurality forms an important part of the settings for the heritage assets identified above albeit in combination with their industrial features and historical development context.
75. As set out above the proposal would have an adverse impact on the settings of the IHCA, SCA, FCA and the Ship Canal. Given that they form part of the wider historical landscape of the area and its setting, the significance of these heritage assets are interrelated and interconnected. Therefore, in this context an adverse impact on one would have at least some adverse impact on the others and their collective setting and historic significance. Consequently, I consider that the proposal would have an adverse impact on these heritage assets and their collective historic significance.
76. The appellant has stated that the Strategic Assessment of Land Availability New Sites Update Report 2018 (SALA)¹⁹ shows that the appeal site could accommodate 80 dwellings without unacceptable heritage harms. However, while the site assessment for site FRA004 does contain a development potential summary with a suggested yield of 70 to 80 units at a medium density (25-30 dph) it does caveat this in its potential impact summary which states that there would be some impact on heritage interest.
77. Moreover, the SALA Heritage Impact Appraisal (HIA) goes on to also highlight that there would only be scope for development on some of the site subject to a 'meaningful and expansive swathe of open space being maintained along the north-east boundary to maintain the distinction between the settlement edge and Sandfield Mill and along Oatfield Lane'. The heritage impact appraisal also observes that the site forms part of the setting of the Ship Canal and that in turn that this canal forms part of the setting and historic and landscape context of the IHCA, FCA and SCA. It also observes that both canals (Ship and Stroudwater Navigation) are characterised by their rural character and the predominant lack of built form along their banks.
78. In addition, the HIA states that the character of the Ship Canal, and the setting and historic context of neighbouring conservation areas, would be impacted by development on the site. It adds that this would likely preclude any built form from up to half of the site, limiting the scale and extent of any such development, in order to preserve the rural character and intermittent nature of development along the canal corridor.
79. Accordingly, I find that the proposed development would negatively affect the historic interpretation of these heritage assets. For this reason, it would fail to preserve the character of the conservation areas as a whole thereby having a negative effect on the significance of these designated heritage assets resulting in less than substantial harm. For similar reasons the proposal would also cause less than substantial harm to a non-designated heritage asset.

¹⁹ Core Documents E.13 and E.14a

80. Paragraph 212 of the Framework, states that great weight should be afforded to the conservation of designated heritage assets, including their setting. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to their significance.
81. Having regard to paragraph 214 of the Framework, the proposal would provide several public benefits including: the provision of homes, social benefits, an economic benefit, environmental benefits and a good design benefit to which I have afforded very substantial, limited weight, moderate weight and no weight respectively as set out later in this decision.
82. Consequently, the above benefits are not of sufficient weight to outweigh the harm to the identified designated heritage assets to which I must attach great weight.
83. Having regard to paragraph 216 of the Framework, as set out above I consider that the proposal would cause less than substantial harm to the setting of a non-designated heritage asset.
84. The proposal would therefore conflict with paragraph 212 of the Framework, and paragraphs 210 and 216 of the Framework which seek to conserve and enhance the historic environment and consider the effect of a proposal on non-designated heritage assets. It would therefore also fail to meet the requirements of Policy ES10 of the SDLP.

Other considerations

85. The main parties agree that the Council cannot demonstrate an adequate five-year housing land supply with the Council putting this at approximately 3.24 years.
86. The proposal would provide 30% affordable housing equating to about 24 dwellings. The parties agree that this affordable housing provision should be afforded the highest weighting and given the evidence before me, I also agree.
87. There is however disagreement between the main parties in relation to the remaining market housing provision of about 56 dwellings. That said, this market housing would alongside the affordable housing contribute to the supply of housing within the District. Given the lack of a demonstrable five-year housing land supply, I afford this overall provision of housing (affordable and market) very substantial weight in the planning balance.
88. The appellant has also advanced the economic benefit that the proposal would bring to Frampton as it would increase demand for goods and services within the settlement thereby helping to support the local economy and help sustain the village. However, as outlined above, while the proposal's future occupiers would have good access to local services, they would have very poor accessibility to strategic goods and services in larger centres elsewhere outside of the village. This means that the appeal site is not in a sustainable location. It is for this reason that I afford this benefit limited weight in the planning balance.
89. The proposal would also result in social benefits via the provision of open space and a financial contribution towards the improvement of existing library facilities. I afford them moderate weight in the planning balance.

90. The main parties also agree that proposal would provide moderate benefits by securing biodiversity net gain and enhanced habitat improvements. I agree and afford these benefits moderate weight.
91. The appellant has also cited the 'good design principles' adopted in the illustrative site layout plan. However, as the detailed design and layout of the proposed housing is something reserved for future consideration, I afford this benefit no weight and therefore this has a neutral effect on the overall planning balance.

Other Matters

92. Interested parties have raised concerns relating to several matters including residential amenity, drainage, flood risk, highway safety and local infrastructure capacity. However, as I dismissing the appeal for other reasons, it has not been necessary to consider these matters any further.

Planning Balance and Conclusion

93. In the context of the above and the evidence before me, I consider that the most important policies for determining this appeal relate to the outstanding matters of the role and function of the settlement, landscape character, character and appearance and heritage. These are policies CP1, CP2, CP3, CP15, ES7 and ES10 of the SDLP. The proposal would substantively conflict with these policies and I therefore conclude that it would conflict with the development plan as a whole.
94. In the absence of a five-year supply of housing land, the most important policies for determining this appeal are out of date as set out in paragraph 11 d) of the Framework. However, just because a policy is deemed out of date does not mean that any conflict with it should be ignored. It also does not mean that it carries no weight. As set out by paragraph 232 of the Framework, due weight should be given to policies according to their degree of consistency with the Framework. The greater the consistency, the greater the weight.
95. As highlighted above, Core Policy CP1 of the SDLP outlines a positive approach to considering development proposals that reflects the presumption in favour of development as set out in the Framework. This is consistent with the Framework and as such I afford any conflict with Core Policy CP1 substantial weight in the planning balance.
96. Core Policies CP2, CP3 of the SDLP identify locations for strategic growth within the plan area and set out a hierarchy of settlements where development should be located outside of these strategic growth locations. These strategic growth locations and identified settlements reflect the plan's ambitions for development being in the most sustainable locations based on the services and facilities located in each settlement. Sustainable development is a core objective of the Framework as a whole and I consider Core Policies CP2 and CP3 to be consistent with it. As a result, I afford any conflict with Core Policies CP2 and CP3 substantial weight in the planning balance.
97. Core Policy CP15 aims to prevent inappropriate development in the countryside with the aim of protecting its quality and the separate identity of settlements. This is consistent with the aims of paragraph 187 of the Framework which states that planning policies and decisions should contribute to and enhance the natural and

local environment by recognising the intrinsic character and beauty of the countryside. As a result, I afford any conflict with Core Policy CP15 substantial weight in the planning balance.

98. Policy ES7 aims to protect the character of the landscape in the District by ensuring that development proposals conserve or enhance the special features and diversity of the different landscape character types found within the area. It also states that development will only be permitted if the materials, scale and use are sympathetic and complement the landscape character. This is consistent with paragraph 135 which states that policies should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting. Consequently, I afford any conflict with Policy ES7 substantial weight in the planning balance.
99. Policy ES10 aims to conserve and where appropriate enhance the heritage significance of the District's heritage assets, especially those elements which contribute to the distinct identity of the District. This aligns with the aims of chapter 16 of the Framework and Policy ES10 is therefore consistent with it. Furthermore, the Framework requires that great weight should be afforded to the conservation of a heritage asset. Moreover, given the unique, exceptional and interconnected local importance of the above identified heritage assets, that the proposal would have an impact upon in this case, I afford any conflict with Policy ES10 very substantial weight in the planning balance.
100. I have found that the proposal would conflict with core policies CP1, CP2, CP3, CP15 and policy ES7 of the SDLP. To each of these harms I afford substantial weight in the planning balance. I have also found that the proposal would conflict with Policy ES10 causing harm to designated and non-designated heritage assets to which I afford very substantial weight in the planning balance. For this reason, I also consider that there is a strong reason for refusing the proposal meaning that the presumption in favour of sustainable development as set out in Framework paragraph 11d) is not engaged. The proposal would also conflict with Core Policy CP3 of the SDLP to which I afford limited weight.
101. Therefore, the proposal would be contrary to the adopted Development Plan when read as a whole and there are no material considerations indicating a decision otherwise than in accordance with it. Accordingly, for the reasons set out above, and having regard to all other matters raised, I conclude that the appeal should be dismissed.

C Coyne

INSPECTOR

APPEARANCES

FOR THE APPELLANT:

Satnam Choongh instructed by Mr Nathan McLoughlin on behalf of Seven Capital plc called:

Nathan McLoughlin BSC (Hons) DipTP MRTPI

John-Paul Friend HND (LGD) BA Hons PGDip LA CMLI

Rob Bourn BA MA MCIfA

Rob Forbes BSc (Hons) MSc MCIEEM

FOR THE LOCAL PLANNING AUTHORITY:

Nina Pindham instructed by Mr Martin Evans on behalf of Stroud District Council called:

Ms Kate Russell BA MSc IHBC

Mr Conrad Moore BSc (Hons) MSc MRTPI

Ms Gemma Davis MSc MRTPI

INTERESTED PARTIES:

Cllr Paul Burnside on behalf of Frampton-on-Severn Parish Council

DOCUMENTS SUBMITTED AT OR SHORTLY AFTER THE INQUIRY

- I.1 - Illustrative Landscape Strategy (dwg no: edp8347_d004)
- I.2 - Outline Habitat Management and Monitoring Plan (edp8347_r004-B)
- I.3 - Recreation Impact Avoidance and Monitoring Plan (edp8347_r006-B)
- I.4 - Shadow Habitat Regulation Assessment (edp8347_r005-B)
- I.5 - Updated NatureSpace District Licence Report
- I.6 – Addendum to the SOCG
- I.7 – Natural England Consultation Response dated 18 September 2025
- I.8 – Natural England Consultation Response dated 19 September 2025
- I.9 - Natural England Consultation Response dated 26 September 2025

Richborough