



Project for 23 homes for Affordable Rent

Claypits, Eastington

Feasibility Report to Parish Council

April 2017

ASTER
GROUP

Eastington Community Land Trust Ltd (“ECLT”) with Aster Group



Site viewed from above, the M5 at the centre, A38 and Claypits to the left and the Cross, bottom right

ECLT is a Registered Society under the Co-operative and Community Benefits Societies Act 2014

registration number 7425, registered address: Hazel Cottage, Millend, Eastington, Stonehouse, Glos. GL10 3SF



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Tom Low, ECLT Secretary

1. Introduction and relevant recent history

ECLT is a voluntary group, set up in October 2013 as a result of the Eastington Parish Plan 2013. In the democratic form favoured by the National CLT movement (i.e. a community benefit society), it welcomes members from across the Parish and elects a Board of Trustees. There are currently 84 members who in December 2016 elected a Board of 9 trustees and co-opted Stroud District Council (“SDC”) Councillor John Jones as an ex-officio member.

ECLT was incorporated as a Community Benefit Society (non-charitable), registered under the Co-operative and Communities Societies Act 2014 (the “2014 Act”), registration number 7425 on 3rd November 2016. Life membership is available to all members for a £1 membership fee.

The need for Affordable housing (“Affordable”) was first identified and quantified in the Eastington Parish Plan of 2013, together with strong support for smaller dwellings both for rent and purchase. This latter requirement was split between younger people wishing to access the housing ladder and older people wishing to downsize. Affordable rents are defined as being 80% of the local market-place rents

To comply with the emerging SDC Local Plan, a Housing Needs Survey (“HNS”) was carried out by Gloucestershire Rural Community Council, reporting in January 2014. A need for 23 dwellings for Affordable rent was identified for the period 2014 – 2019.

The HNS findings were carried forward to the Neighbourhood Development Plan (“NDP”) which passed the Parish-wide referendum by 91% on 18th August 2016. The NDP process was very relevant for ECLT since it contained a series of public consultations at which the concept of this project was sounded out successfully.

The NDP also developed a methodology for identifying sustainable sites, based on such sites being within 800 metres of Alkerton Cross (shops and services) and also 800 metres of the OHMG Community Centre (nexus of leisure facilities). This was codified in the NDP in section 8, specifically 8.0.6.

2. Strategic match with Local Plans

2.1 SDC Local Plan 2015-2031

SDC’s Local Plan, adopted in November 2015, laid out strategic plans for commercial housebuilding for at least 11,400 dwellings and 940 units of residential or nursing care. Beyond that, villages such as Alkerton were not expected to absorb more commercial housing, provided SDC maintained a housing supply of at least 5 years’ permissions.

However, any rural parish was allowed to bring forward “exception” sites, beyond a village envelope, provided those houses were primarily for Affordable Housing. This principle has existed in planning law for at least 30 years, the latest version being detailed under Policy HC4.

The principal points for compliance are:-

- The evidence of a suitable HNS and that homes must primarily be Affordable;
- Ownership of the land by the ECLT or the parish in perpetuity;
- Sustainability of the site in accordance with National Planning Policy.

The 2014 HNS has been accepted by SDC planners as viable and relevant (see 4.1 below). Since the site will be 100% for Affordable rent, it is a true “exception” site in planning terms

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ECLT has an obligation within Part A of its Rules of Incorporation, called an “Asset Lock”, which has to comply with section 29 of the 2014 Act. The site will be owned in perpetuity by ECLT and the houses operated on a 125 year lease by Aster Group, a Registered Provider of social housing.

The site being within comfortable walking distance of village services and also on a bus route to larger towns’ services, qualifies it as being “sustainable”.

2.2 Eastington NDP

The NDP, in Section 8, Policy EP5, encourages the promotion of exception sites for Affordable Housing, within the provisions of SDC Policy HC4.

To comply with section 8.0.6 of the NDP, all eight landowners with sites viable to build at least 23 houses within the preferred range of 800 metres from Alkerton Cross (the “Cross”) and 800 metres from OHMG were interviewed during the NDP process. ECLT has pursued only such sites, in a priority order, radiating from the point equidistant from the OHMG and the Cross.

- One landowner wished to remain in farming and ruled himself out
- One landowner applied for planning permission for 70% market housing
- One site proposed in the draft NDP, not popular with the public,
- Three landowners wanted 49% market housing
- Two landowners were happy with 100% Affordable

The chosen site is the closer of the latter two and also the site with much better access to bus and utility services than the other potential 100% affordable site.



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3. Phase One technical reports

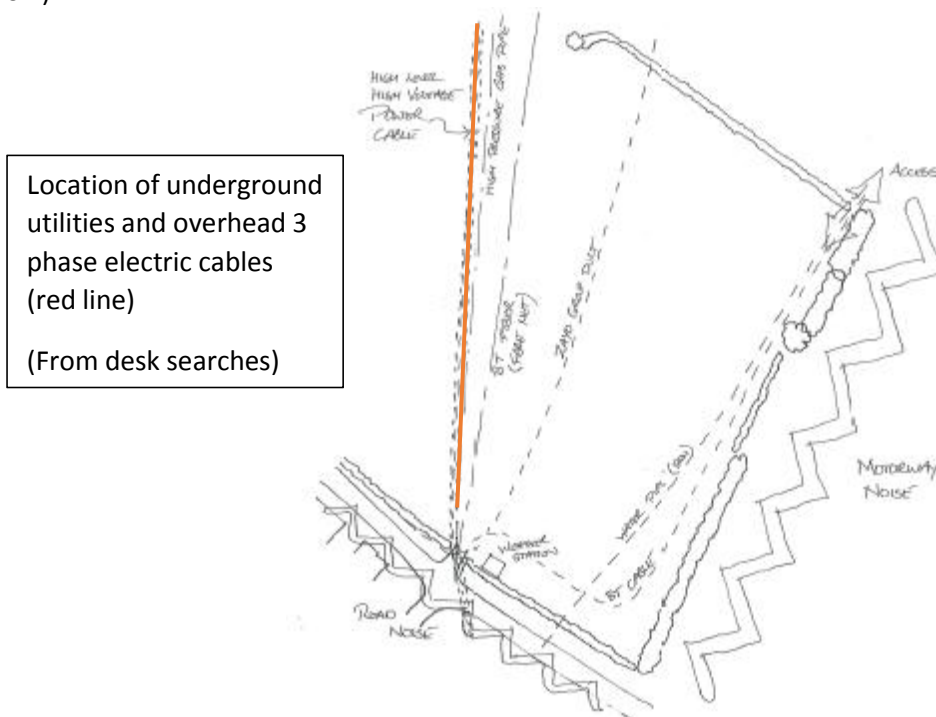
Seven technical reports have been completed to support the Architects' design decisions which are covered in section 3.1. All the reports were instructed to be a broad feasibility, with highlights for any problematic issues which would have to be investigated in a Phase Two report to inform the Full Planning Application. All the reports are held on the ECLT Technical Dropbox for access by planners and other relevant consultants

3.1 Ground Survey and Utility Desk Search

The first report was carried out by Core Geotechnics and identified no significant problems. The site is relatively flat, the sub-soil is clay/mudstone of the Charmouth Mudstone Formation and drainage is relatively good.

The potential for contamination on site from historic and current activities is considered to be negligible to low.

A routine desk search for presence of utilities was also commissioned which was used by the Architect in conjunction with the Topographic Survey to produce first cut designs. The location of several pipelines and cables gave cause for concern sufficient for a Ground Penetrating Radar survey ("GPR") to be commissioned (see 3.4 below).



In a Phase Two Ground Survey, trenching will be undertaken to confirm the soil composition and samples taken for analysis to confirm the absence of contaminants.

3.2 Ecology Survey

Director of Conservation for Gloucestershire Wildlife Trust, Dr Colin Studholm, conducted a site examination and, like the Ground Surveyor, found nothing extraordinary. The site has been used for arable crops for at least 150 years according to records (maybe even 2,000 years) and is surrounded by mechanically chopped hedges. He saw potential for habitat and landscape enhancement on this blank canvas and this will be examined in Phase Two in conjunction with the acoustic report and the Architects' layout design.

3.3 Topographic Survey

Midland Surveys of Stroud provided a standard on-site measured survey, a necessary baseline for the Architects work. In summary, there is a gentle drop of 2 metres from the field gate to the north-east corner, over a distance of 150 metres, indicating how flat the site is for a builder/developer.

3.4 GPR Survey of underground utilities

This additional survey used GPR and other technologies to more accurately plot five key pipelines/cableways for line and depth. Whilst this would have had to be done as a Phase Two report, it was brought forward due to a lack of confidence in the precision of the information provided by the utility companies.

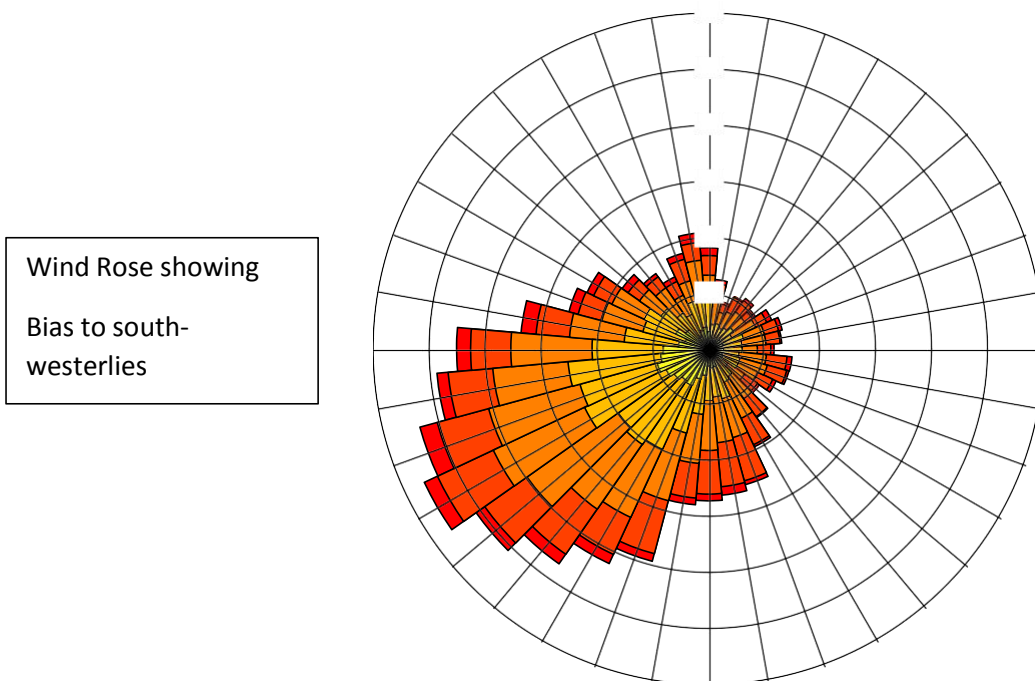
The work was carried out by Midland Surveys and integrated with the earlier Topographical Survey to inform the Architects' final design and the Engineering Consultants detailed designs (see 6.3 below)

3.5 Air Quality Survey

Stroud DC requested this report and the Acoustic Survey (3.6 below) because of the proximity to the motorway.

Both studies were carried out by Hydrock Consultants, the Air Quality being a more desk based exercise because data has to be drawn from several years' sampling.

Local sampling records showed contamination levels at the eastern side of the M5 to be well within limits. However, since this site is on the western side, with prevailing winds 90% from the south west, potential for contamination would be even lower.



The same wind currents would also mitigate the possible dust contamination from the construction phase, except for the depot sited east of the motorway, where there is a medium risk.

No Phase Two report is considered necessary.

3.6 Acoustic Survey and Report

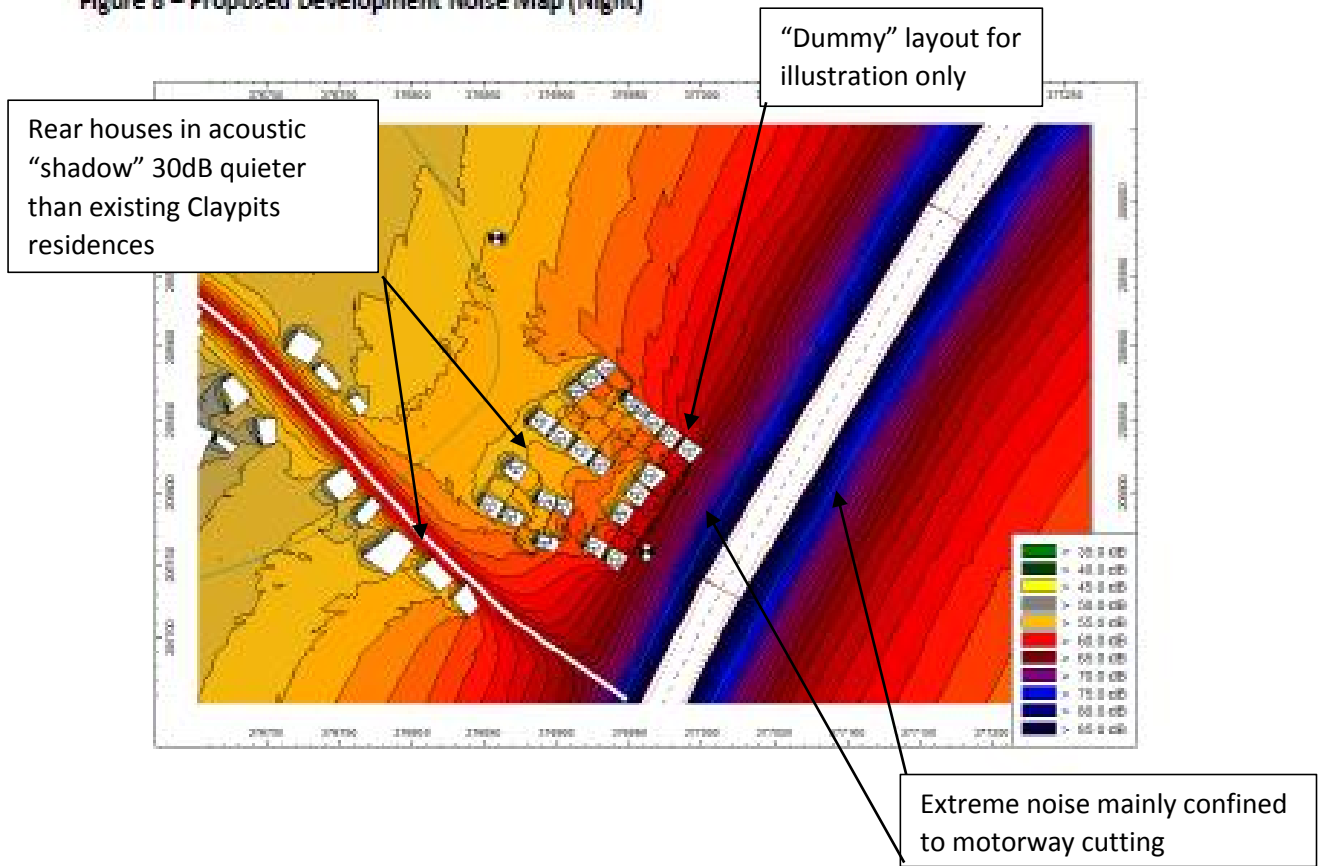
An on-site survey was conducted continuously from Friday 9th December to Monday 12th December 2016 using three industry compliant monitoring points.

Hydrock Consultants produced a model of decibel gradients which showed how the excessive motorway noise was partly mitigated by the cutting (throwing most noise up rather than sideways to the site). However, readings for both day- and night-time were above recommended levels and at least three mitigation measures will be necessary:

- An acoustic barrier along the top of the motorway cutting, comprising an earth bund with an acoustic barrier fence
- Garden fencing (considered standard anyway) will contribute for open areas
- Some windows closest to the motorway may have to be sealed using MVHR venting. Ideally these should be bathroom and stairwell windows.

The Hydrock model, using a dummy layout, also indicated that houses further from the motorway would be shielded by those closer to the motorway.

Figure 8 – Proposed Development Noise Map (Night)



The degree to which this "shadow" effect and the three primary mitigation measures above, are effective, will be re-modelled in a Phase Two exercise, using the final Architects' design of layout and house types.

4. Pre-Application planning advice

4.1 Strategic discussion on Exception Site Policy HC4

On 25th November 2016 a meeting with John Longmuir and Pippa Stroud of Stroud DC Planning established that ECLT’s site complied with Policy HC4. This hinged upon the existence of the Housing Needs Survey (establishing type and quantity as 23 mainly smaller dwellings) and the Eastington NDP clause 8.0.6 which verified the sustainable nature of the chosen site (within 800 metres of both the Cross and the OHMG).

4.2 Environmental Health consultation

A number of discussions and e-mails established the Stroud DC requirement for both an Acoustic survey and an Air Quality report upon the site. At a meeting with David Jackson of Stroud DC on 12th January 2017, the outcome from the Acoustic Survey (see 3.6 above) was shared. Mr Jackson advised that he preferred to see earth bunds as the primary mitigation and agreed that accurate application of the other factors such as acoustic fencing, double and triple glazing and fixed windows with mechanical ventilation should bring noise nuisance within WHO guidelines.

The Air Quality report was reviewed on 3rd March 2017 by Mr Jackson, who found it fully acceptable, provided the usual conditions for on-site dust and mud mitigation during construction were observed.

4.3 Outlines of Section 106 local priority and Potential mix of types

At the meeting of 25th November 2016, Pippa Stroud highlighted the need for smaller houses and at a subsequent meeting on 12th January 2017 with Laura Stephens, discussing the Homeseeker Plus allocations system, expressed support for our intention to have 50% 2-bed with 40% 1-bed and just 10% 3-bed accommodation.

Both discussions covered the likely style of the Section 106 Agreement requirement for local priority, which would follow those already in place for Bush Close and Bradestone’s Way. An improvement in ECLT’s case, over these two projects, is that the ownership in perpetuity removes the option of right-to-buy.

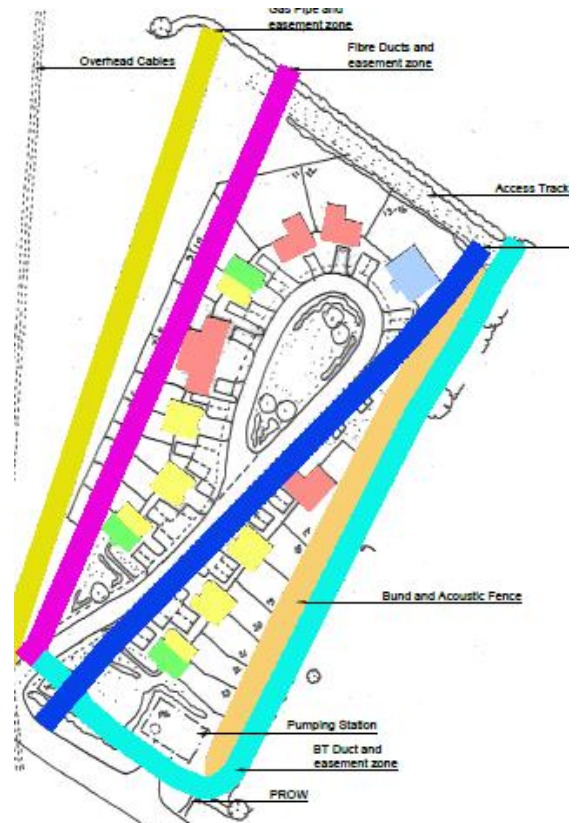
4.4 Formal SDC Pre-Application Meeting and Advice

ECLT representatives and the architect met Holly Simkiss, Principal Development Control Planner on 3rd March 2017. Mrs Simkiss was pleased with the depth of reports presented and with the latest draft layout. Her advice was to swap the bungalows to the eastern edge i.e. nearest the acoustic bund, such that the taller 2 and 3 bed semis were furthest from the noise source. ECLT will test that with the acoustic model developed by Hydrock Consultants.

In the layout opposite, the thick yellow, purple, blue and light blue lines represent the underground pipes and cables with their respective easements.

The colour code for the buildings is:

- Red - 1-bed bungalows (5)
- Blue - 1-bed flats (4)
- Yellow - 2-bed houses (11)
- Green - 3-bed houses (3)



5. Local Consultation

5.1 Neighbourhood consultation

Direct approaches have and will be made to Claypits' residents. The first was a 100% letter posting containing full details of the strategic reasons for the choice of site. Three positive reactions and no negative reactions were received.

The next meeting in what is an on-going process, will be a "drop-in" at KB Coaches offices in Claypits, planned for 29th April 2017.

5.2 Parish Council

In many respects, the Parish Council has been instrumental in evolving the need for and concept of, ECLT from 2010 onwards. The seeds were sown in the Parish Survey which eventually reported in 2013, leading to the Parish Council calling for the HNS by 2014.

The project having evolved throughout the NDP process, ECLT became an independent Trust in 2016, putting the onus on the Trust to formally consult just as any significant developer would be expected to do.

An initial presentation on strategic matters was made to the full Council on 27th October 2016, who supported the application in so far as it complied with the NDP, policy EP5 and also the Stroud DC Local Plan policy HC4.

The Parish Council also considered the project on 13th October 2016 and agreed to allocate £2,000 from the Solar Fund immediately, with a reserve of £4,000 contingent on successful completion of the Feasibility Stage.

Members of the public were present at both Council meetings and several participated in a constructive debate. Salient points were minuted by the Clerk.

A presentation of report findings, a draft site layout and building plans and elevations, was received by the Parish Council Planning Committee on 23rd March 2017.

5.3 Parish Public consultation

In shaping the parish survey of 2011-2012, meetings were held in the OHMG and the Village Hall allowing members of the public to record their main interests, hopes for and concerns about, their parish. Affordable housing as well as smaller market housing were amongst the issues raised and subsequently included in the questionnaire.

Feedback to the public came by way of the 2013 Parish Plan which was hand delivered to every household, together with the HNS questionnaire.

Several NDP public meetings allowed for consultation on the principles of Affordable Housing in 2015 and 2016, culminating in Policy EP5 being a part of the 91% positive vote in the 18th August 2016 referendum.

All ECLT meetings are open to public scrutiny and a consultation period of 10 minutes (or longer if appropriate) is allowed at each Board meeting.

Drop-in events have been run at the Village Hall during 2016 which have attracted dozens of attendees each, from which the current membership of 84 has partly been garnered. This is an on-going process and another drop-in will be run at the Village Hall 27th April 2017, to hear reactions to the latest site layouts, elevations and house plans

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6. Design Feasibility

6.1 Practicality of housing mix

The need for 23 units was established by the HNS in 2014 and an emphasis on smaller homes, identified in the Parish Plan 2013, was reinforced by the HNS. A close analysis of the 38 responses, which included both market and affordable housing needs, showed a preference for the 23 affordable houses to be

3-bed	1
2-bed	13
1-bed flat (under 65s)	3.5 (expected to be a block of 4, 2-up, 2-down)
1-bed bungalow	5.5

SDC consultations (4.3 above) also concurred with the stress on smaller units. It is not possible to match Homeseeker Plus applicants exactly to this mix, so some flexibility exists for the Architects, as is seen in 4.4 above.

Aster Group, who will be responsible for efficient management of this mix of homes, have been consulted at all stages of design and agree on the preference towards smaller units.

6.2 Practicality of Layout

To remain within 800 metres of the Cross (a requirement of the NDP, 8.0.6), the site is to be adjacent to the M5 motorway, taking about 35% of the arable field as illustrated on page 1 of this report.

The obvious constraint is the 11kva overhead power line and it is practical to fit all 23 houses to the east of that.

The Utility survey (item 3.1 above) identified five significant underground pipes/cables which constrain the Architects. The first cut design of 15th December 2016 proved that 23 homes could be fitted in the space, allowing for these constraints.

The second-cut designs also coped with them and fine-tuning of design was further advised by the GPR survey (item 3.4 above). The current draft layout is shown at 4.4 above.

The only Phase One report to require detailed risk assessment was the Acoustic Report, for which appropriate mitigation measures have been calculated. The opinion of the Architect is that earth bunds may be constrained by two of the underground service pipes/cables but that can be managed by implementing a larger acoustic fence on top. With these measures, the risk is believed to be manageable.

6.3 Connection to utilities and services

The site is well placed for all the usual utilities, which are accessible from the verge.

Highways access is straightforward, there being an existing entrance which has been shown to have appropriate visibility splays for a 40-mph zone. The no.61 bus from Dursley to Stonehouse and Stroud passes the site entrance.

There is an outstanding query over the access to the gravity sewer from the northern parts of the site. This requires detail from the GPR survey (3.4 above) and input from engineers. This is a factor in costing, since a pumping station may be required but (cost apart) it is not a practical barrier.

7. Executive Summary

ECLT believes this project to be worthy of progressing to Full Planning on the basis of work done so far:

- The site complies with SDC Local Plan Policy HC4 and Eastington NDP policy EP5
- The seven technical reports commissioned show no insurmountable problems. Two indicate a need for more detailed work (the Acoustic Survey at 3.6 above and the GPR survey at 3.4 above) and mitigation measures have been calculated to bring these risks within acceptable bounds.
- Consultation with SDC has been positive and constructive, covering housing mix, Local Plan compliance and Environmental Health issues
- Local consultation has been extensive and supportive. Such objections as have been met have been clarified and/or absorbed. ECLT's status as a democratic, locally-generated organisation has differentiated us from external developers
- The effort applied in conjunction with the architect has refined a choice of layouts which meet the expressed needs of the 2014 HNS, in terms of mix and number of housing types.

The continuing round of consultation with SDC, the Parish Council, neighbours in Claypits and the general public of the parish will carry on through to Phase Two, the full planning application

- The agreed layout will be fed into the model for acoustic mitigation and a drainage model
- Aster Group are using Phase One reports arrive at a cost estimate for the build and to begin the process of organising appropriate funding. There are choices of sources of grants which will be finalised early in Phase Two
- ECLT will build up funds for Phase Two from a variety of sources:
 - Department of Communities and Local Government
 - Locality Project Support Grant
 - SDC Homes and Communities Grant.

It is ECLT's belief that this report provides proof of Feasibility in terms of Planning Law compliance, financial robustness and acceptability to the Parish Council and public of the parish.

The Parish Council reserved £4,000 from the Solar Fund, to be provided upon completion of Feasibility, which is the purpose of this report. ECLT now requests that this grant be released.