



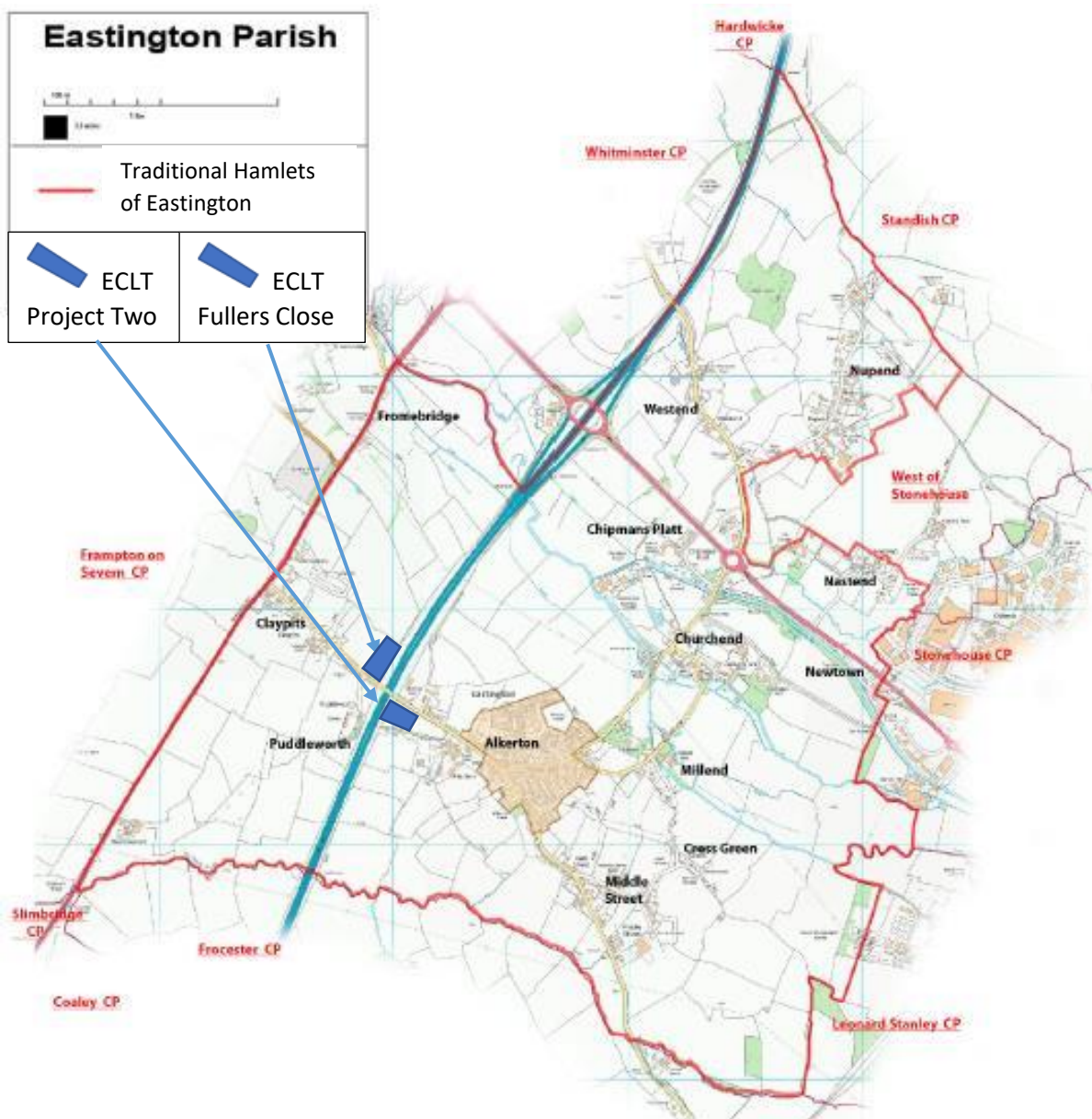
Eastington Community Land Trust Ltd (“ECLT”)

Project for 21 homes for Affordable Rent and 10 for Affordable Shared Ownership

Homeground, Eastington

Feasibility Report

March 2021



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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Version Control:	1:	Internal draft TAL
	1.1:	TM amends, TL edit
	1.2:	Draft issued to Board 25 th February 2021
	2.0	Final issues to Homes England 5 th March 2021

Tom Low, ECLT Secretary

1. Introduction and relevant recent history

1.1 Foundation of ECLT

Eastington Community Land Trust is a voluntary group, originally formed in October 2013 as a result of the Eastington Parish Plan 2013.

The Trust was subsequently incorporated as a Community Benefit Society (non-charitable), registered under the Co-operative and Community Benefits 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.

In the democratic form favoured by the National CLT movement (i.e. a community benefit society), it welcomes members from across the traditional hamlets of Eastington and elects a Board of Trustees.

There are currently 124 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. The Board was re-elected in 2019 with one change.

1.2 Project One

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% or less, of the local market 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 and these 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 helpful for ECLT since it contained a series of public consultations at which the concept of Affordable 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 800 metres of the OHMG Community Centre (nexus of leisure facilities). This was codified in the NDP in section 8, specifically 8.0.6.

ECLT activated its first project to meet the stated need for 23 homes, which culminated in the building of Fullers Close in Claypits. This was completed in December 2020 in time for tenants to move in and enjoy their first Christmas in their new homes.

100% of the tenants had strong local connections to Eastington, fulfilling ECLT’s main objective. The homes were heavily over-subscribed by qualifying applicants in housing need, underlining the need for Project Two.

1.3 Project Two Rationale

The HNS was repeated in mid-2019 to sustain the relevance of the dataset. There was in parallel a revision of the SDC Local Plan underway which made it prudent for ECLT and the Parish Council to keep up to date.

The overall result was that 54 people self-identified as requiring affordable housing – far beyond the 23 homes under construction at Fullers Close.

Interestingly, there was a strong need expressed for Affordable Shared Ownership, which ECLT felt obliged to acknowledge.

Project Two was therefore initiated in late 2019.

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2. Strategic match with Local Plans

2.1 SDC Local Plan 2015-2031

SDC's Local Plan, adopted in November 2015, laid out strategic sites 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' planning permissions.

However, any rural parish could 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 of the SDC Local Plan.

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 such that the properties remain Affordable in perpetuity;
- Sustainability of the site in accordance with National Planning Policy.

The 2019 HNS has been accepted by SDC planners as relevant under Policy HC4 para 1 (see 4.1 below). Since the site will be 100% for Affordable rent or Affordable shared ownership, it is a true "exception" site in planning terms.

ECLT has an obligation within Part A of its Rules of Incorporation, called an "Asset Lock", which must comply with section 29 of the 2014 Act. The site will be owned by ECLT and its successors in title/assigns in such a way as to ensure that the properties remain available as Affordable in perpetuity. The houses will be managed under a 125-250 year lease by Two Rivers, a Registered Provider of social housing with strong experience of shared ownership homes.

The site being within comfortable walking distance of village services and on a bus route to larger towns' and the city of Gloucester's 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 Local Plan Policy HC4.

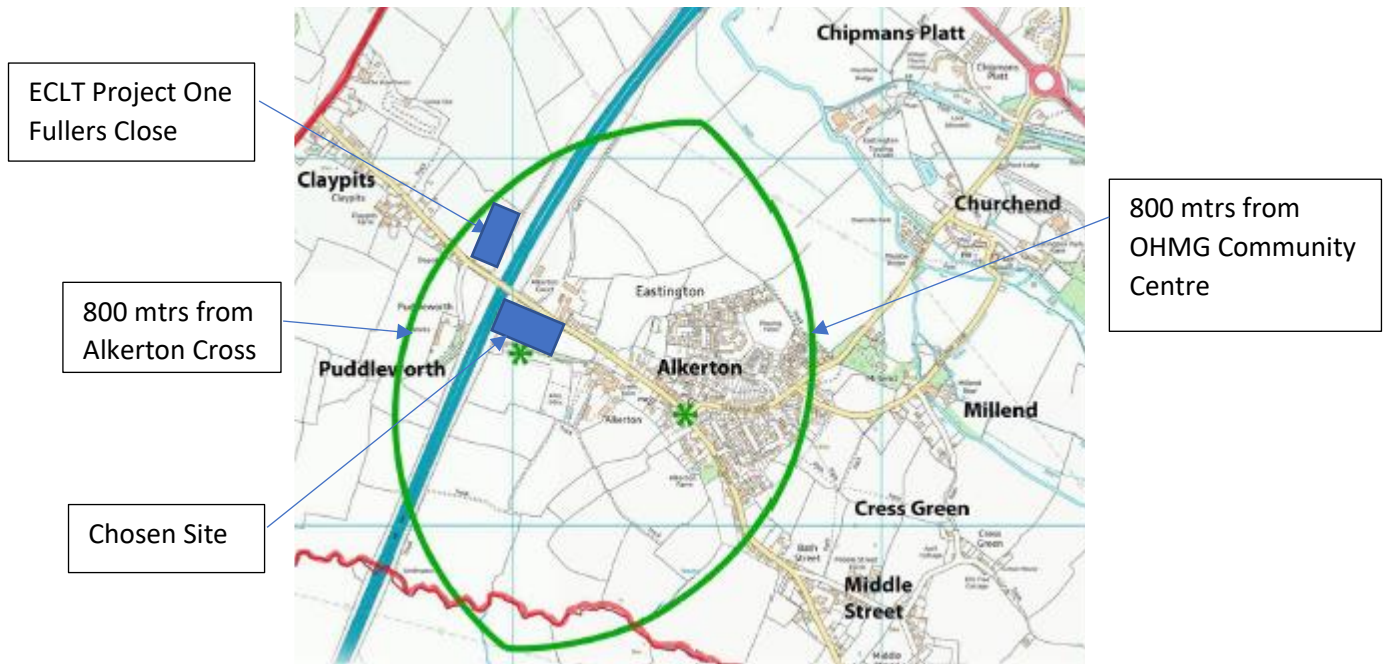
To comply with section 8.0.6 of the NDP, all landowners with sites viable to build at least 30 houses within the preferred range of 800 metres from Alkerton Cross (the "Cross") and 800 metres from OHMG were considered. ECLT has pursued only such sites, in a priority order, radiating from the point equidistant from the OHMG and the Cross (see diagram on next page).

One landowner is known to desire 70% market housing and access to another is difficult and expensive. The school playing field cannot be developed unless the facility can be replicated elsewhere (GCC Estates have been unsuccessful in providing that on two occasions).

The chosen site has excellent access to bus and utility services, is actually adjacent to the OHMG facilities and is less than 400 metres from the shops at Alkerton Cross.

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2.3 SDC Local Plan Review for 2022-2040

ECLT Project Two also meets the criteria for the Review, in that it continues the production of affordable homes in line with the NDP.

It is agreed that, since ECLT is fulfilling the stated needs of each successive HNS and hence implementing the NDP, Alkerton will not have any strategic allocation of market housing in the current review. Alkerton is a Tier 3A settlement and all others in this group have been allocated a market site of between 30 and 80 units in the 2019 Final Draft of the Local Plan Review.

As part of the SDC Review, there will be policy changes e.g. policy HC4 becomes DHC4 but the content does not substantially change. The Parish Council is committed to updating the NDP to remain in parallel with the Local Plan.

2.4 Compliance with Homes England Community Housing Fund (CHF)

Trustees felt that the expertise gained through Project One would allow ECLT to take a more pro-active role both in design and in managing legal contracts.

Key to this was the reasonable availability of public funds in 2017/18/19, specifically the Homes England Community Housing Fund (CHF) Revenue Grant scheme.

It was established that Project Two met the criteria for a £144,000 grant to carry the project all the way to start on site. Unfortunately, the decision on providing the grant was held up first by the December 2019 snap election, then by the run-up to Brexit. This brought the timeframe for doing the project close to the expiry of the CHF in March 2020 such that it was only possible to have £72,000 and then only by gaining an exemption from the deadline with a 12-month postponement.

This was gratefully received, along with a match-funding of £8,000 from the Parish Solar Fund.

Publication of this report will constitute the final milestone under the terms of the grant, triggering the last payment of 10%.

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3. Phase One technical reports

Lessons learned in Project One included doing as much of the ground surveying as possible, right at the start. The budget levels used to justify the CHF grant allowed for this, reducing some risks found during Project One and providing analyses of the whole of Homeground to ensure we could build wherever suited. A similar process was followed by all the other technical consultants.

All the reports are held on the ECLT Technical Dropbox for access by planners and other relevant consultants.

3.1 Ground Surveys

Another lesson from Project One was to group technical reports where possible, to save tendering effort for both ECLT and the consultants. All ground surveys were procured, after tendering, from Midland Surveys of Stroud:

- Utility Desk Search
- Topographic Survey
- Geological survey
- GPR Survey of underground utilities
- Trial pits
- CBR tests

The resulting Ground Survey Report and Geotechnical Report were very encouraging, identifying no unknown risk factors. The site is relatively flat, the sub-soil is very stable Jurassic clay of the Charmouth Mudstone Formation, drainage is relatively good, sloping gently to the south west.

Anecdotal evidence of the potential for contamination from the M5 works in 1968/69/70 proved to be unfounded.

Both the desk search and the GPR confirmed there were no pipes or cables under the field, allowing the Engineer to design his cut-and-fill with no restriction.

Access to regular utilities running under Claypits Road were easily accessible.

The Geophysical Report supported the use of conventional foundations, further simplifying the engineering.

The gradual slope to the South West indicated that drainage from all units would flow under gravity but of course, that then necessitated a pumping station from the south west corner back up to the main road (see 3.3 below).

All these reports are of a quality to be taken forward directly to the Planning Application.

3.2 Ecology Surveys

Stroud Valley Project (company number 224016), a group respected by Stroud DC ecologists, conducted two surveys, to cover both winter and summer fauna and flora.

They found nothing extraordinary, the site being species-poor grazing land for at least the last 50 years. The hedges are in poor condition but a wildlife corridor running along the southern boundary showed some complex activity, particularly avian species.

There is much potential for habitat and landscape enhancement on this blank canvas and this will be examined in Phase Two in conjunction with the Architects' layout design.

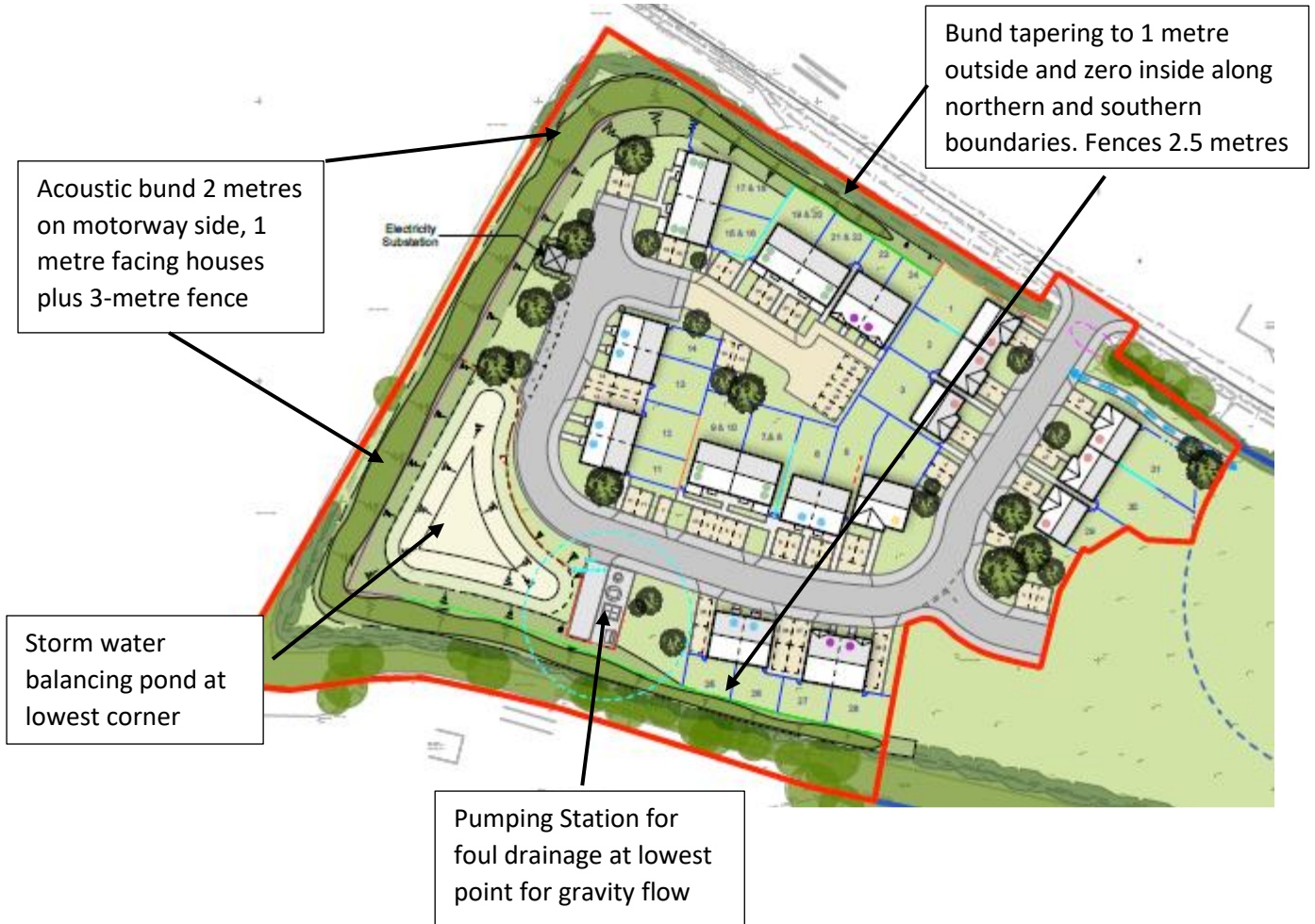
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3.3. Engineering and Drainage

The Ground Surveys established the principle of gravity flow of both storm and foul drainage to the South West corner. The Engineer was able to establish the foundation levels to achieve this in practise. The diagram below is an early housing layout but the drainage plans are unlikely to change.

The balancing pond is calculated to absorb the 100-year flood levels, with over-sized pipes in some parts of the network taking a proportion of the 30-year calculated flood. The pond is serviced by an attenuation valve system to regulate output into the existing ditch on the southern boundary.



The positions of the acoustic bunds and fences are also unlikely to change because they are dictated by the noise from both the Motorway and the Claypits Road (see 3.6 below: heights of fences may change).

3.4 Highways Access

The existing field access enjoys excellent visibility in both directions, well above the 120-metre distance required for a 40-mph zone. There are exits from the haulage business to the north which are well spaced both to the east and the west. Details are contained in Helix Consultants’ preliminary report.

Pedestrian egress is onto an established 1.2-metre-wide pavement, extending east for 350 metres to the cluster of shops and services at Alkerton Cross. An hourly bus service runs to Dursley and Stroud.

It is proposed to provide a permissive footpath egress on the southern boundary to provide traffic-free access to the OHMG Community Centre and Snakey Park playing fields.

3.5 Air Quality Survey

In the light of traffic abnormalities due to Covid-19 lockdowns, it was agreed with Stroud DC Environmental Health to waive this report at the pre-app stage. Historical records show that no part of the M5 corridor within Stroud district suffers from air quality issues.

3.6 Acoustic Survey and Report

Trustees recognised that Acoustic levels on this site represented a significant risk factor to the project. Surveying was prioritised as an early task and budget allowed for multiple runs of the resulting acoustic models. This budget continues beyond the Feasibility Stage.

The on-site survey was conducted continuously from Thursday 12th December to Tuesday 17th December 2019 using three industry compliant monitoring points. Due to inclement weather, a second survey was conducted from Friday 3rd January to Monday 6th January, when the weather was dry with light winds. The readings were quite similar in the end.

The plot below shows the modelling of a July 2020 layout as used for the Pre-App submission to Stroud DC planners. The effectiveness of the bund systems by the motorway shows up well.

What is less satisfactory is the number of gardens with orange readings which represent 55dB to 60dB, above the WHO and British Standard acceptable levels.



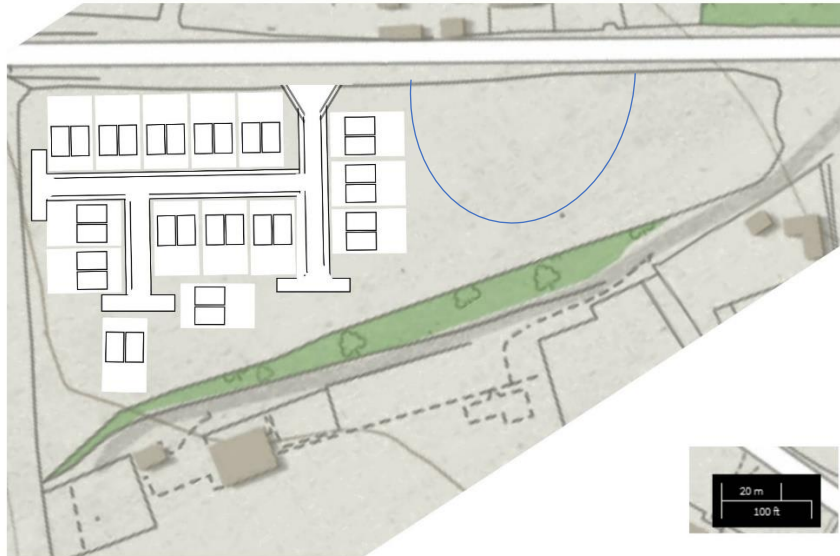
Subsequent layout designs have addressed this by reversing houses in the northern part of the site, such that they face the noise coming from Claypits Road. This in turn provides an acoustic shadow for their gardens, more like the houses in the centre (see January 2021 draft, section 6.2).

4. Pre-Application planning advice

4.1 Strategic discussion on Exception Site Policy HC4 and Heritage factors

ECLT identified the presence of the Grade II listed Alkerton Court as a significant risk factor and so consulted the Stroud DC Heritage Planner in September 2019. It was provisionally agreed that the use of an open “apron” to be left clear of buildings would represent appropriate regard for the setting of the Georgian house.

This key decision confirmed that, for around 30 homes, the development would have to be tucked into the western half of the field. In all plans, this is now represented by a blue line:



On 5th November 2019 a preliminary meeting with John Chaplin of Stroud DC Planning confirmed the understanding on the heritage issue and established that ECLT’s site complied with Policy HC4. This hinged upon the existence of the 2019 Housing Needs Survey (establishing type and quantity as 31 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 Formal SDC Pre-Application Submission and Advice

Because of Covid-19, it was not possible to meet Stroud DC officers and so a formal report was prepared and submitted by E-mail, with the formal advice being issued on 11th September 2020 from Principal Planner John Chaplin.

The advice centred on the acoustic issues discussed in Section 3.6 above, for which David Jackson of Environmental Health issued a set of standards to be met, by gardens particularly. Whilst acknowledging that higher barriers would be needed along the motorway boundary, Advice was to avoid overbearing barriers along Claypits Road.

Otherwise, the Advice acknowledged the positive situation with the heritage issues, ecology reports and engineering factors such as drainage. Specific suggestions were to retain and improve all the hedgerows, with particular attention to the wildlife corridor along the southern boundary and to provide a footpath through to Snakey Lane and the OHMG Community Centre.

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5. Local Consultation

5.1 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.

For Project Two, the key meeting was in September when the Parish Council considered an application for £8,000 from the Solar Fund to match-fund the £72,000 CHF grant from Homes England, which was unanimously approved.

5.2 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.

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.

Due to Covid-19, no public drop-in events, such as were a feature of Project 1, could be held.

The key consultation was via the Eastington Community News in October 2020, delivered to every home in the parish. There were no dissenters neither by e-mail nor within social media.

It is hoped that by the time that the planning application is imminent, lockdown protocols allow for a modicum of face-to-face discussion in a Village Hall drop-in event in late spring or early summer.

6. Design Feasibility

6.1 Practicality of housing mix

The need for 31 units was established by the HNS in 2019 and an emphasis on smaller homes, identified in the Parish Plan 2013, was reinforced by the HNS.

A new factor in the 2019 HNS was a strong requirement for Shared Ownership, a factor which was completely absent from the 2014 HNS. The Board felt obliged to respond to this, albeit with a reduced volume of 10 units for Shared Ownership. Advice was taken from Two Rivers HA, Stroud DC and Homes England, the gist of which was that 8 two-bed homes and 2 three-bed homes should sell without reverting to tenants with no local connection.

Shared Ownership homes will be offered at 40% purchase/60% rental shares initially and tenants can then purchase additional shares (called staircasing), usually 20% at a time.

Through a special exemption ECLT and Two Rivers have agreed that staircasing can reach 100% ownership if required (usually this is limited to a ceiling of 80%).

There is a statutory requirement that will be inserted into each lease of a dwelling that whenever a tenant owning 100% comes to sell their home, the tenant must sell the shares to Two Rivers HA, or to a housing association or registered social landlord nominated by Two Rivers HA, who guarantee to buy it. This gives

- lenders much more comfort, yielding lower rates of interest than homes with 80% maximum staircasing
- owners a quick and simple sale
- the Housing Association an opportunity to re-sell at the entry level of 40% ownership share
- ECLT belief that the property will stay within the affordability of a tenant with a local connection

We are grateful to Two Rivers for suggesting this and to Homes England and Stroud DC who have the power to bestow the exemption.

It was agreed with Stroud DC at an early stage that the mix would reflect the 2019 emphasis on flats and bungalows for early design work. This would be allowed to flex once the homes at Fullers Close were let, yielding an up-to-date measure of demand i.e. how many people with full local connection qualification applied for each house type and how many were left on the list after all the homes were allocated. This will be resolved after the Feasibility Stage.

6.2 Practicality of Layout

Compared to the underground network of pipes and cables at Fullers Close, this site has no physical constraints. Two locational factors have been discussed above:

- In order to respect the setting of the several Grade II listed buildings, the development must start from the western half of the field (see 4.1 above)
- Orientation of houses to create maximum acoustic shadows for garden spaces to be below 55 dB (see 3.6 above)

As has been illustrated at various points in this report, the architect has had to work through several iterations of a masterplan, with four sets of plans and accompanying acoustic model runs being involved.

The one consistent layout component has been the engineering elements, which are logically dictated by the topography:

- Balancing pond and pumping station at the lowest point (south west corner)
- Location of acoustic bunds and fences, albeit that the scale of these has been increased from first designs

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The masterplan layout will continue to be adjusted to the best information available from a wider and wider schedule of statutory and non-statutory consultees. The layout under scrutiny as at March 2021 is provided below:



This design features enclosed, secure gardens in the centre, most gardens being in the acoustic shadow of their houses. The acoustic fences are tapering from the west, the different colours representing:

- | | | | |
|--------------|----------------------------|------------------------------|--------------------------|
| • Purple | 2.0m acoustic fence | 2.0m bund (external measure) | 1.0m internal appearance |
| • Yellow | 2.5m | 1.5m | 0.5m |
| • Green | 2.5m | 1.0m | zero |
| • Light Blue | 2.5m | no bund | zero |
| • Dark Blue | 1.8m timber (garden) fence | | |

The external measures of the bund are shown because that is what deflects the noise. Within the site, the visual effect is much less.

There are areas marked with purple dotted lines where the bunds affect the existing shrubbery but these will be re-planted to suit the revised profiles and to help screen the fences in the south west in particular

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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 technical reports commissioned show no insurmountable problems. Two indicate a need for more detailed work (the Acoustic Survey at 3.6 above and the Ecology Survey at 3.2 above).
- Consultation with SDC has been positive and constructive, covering housing mix, Local Plan compliance and Environmental Health issues
- Local consultation has been curtailed by Covid-19. ECLT's status as a democratic, locally generated organisation has differentiated us from external developers and so we proceed with the implicit support of our peers.
- The effort applied in conjunction with the architect has refined a choice of layouts which meet the expressed needs of the 2019 HNS, in terms of mix and number of housing types.

The continuing round of consultation with Stroud DC, the Parish Council 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
- Two Rivers have been monitoring the expected costs using ProVal software and are comfortable that costs of infrastructure can be borne with a layout of 30 or 31 homes
- Two Rivers have provisionally reserved funds in the Homes England CME capital programme (Continuous Market Engagement) with a view to achieving Social Rents on the 21 rented homes. This would be an improvement on Fullers Close Affordable Rents of perhaps 10% reduction.
- ECLT are pleased to be partnering with Two Rivers HA, not least because of their experience in Shared Ownership, which is a new factor for ECLT

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

Tom Low, Secretary ECLT

3rd March 2021

Board minute 5.3

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