



**Representations on the Stroud
District Local Plan Review
Draft for Consultation –
November 2019 – January 2020**

On behalf of:
Metier Homes Ltd
January 2020

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1.0 Introduction

- 1.1. Zesta Planning has been appointed by Metier Homes Ltd to make formal representations on the Stroud District Local Plan Review - Draft for Consultation (hereafter referred to as the 'SDLPR'). This document was published for period of consultation between November 2019 and January 2020.
- 1.2. The purpose of this representation is twofold:
 - (1) For the respondents to make their views known on the proposed strategy, policies and site options contained within this document; and
 - (2) To promote the allocation and/or inclusion within the proposed Settlement Boundary of some additional land at Eastington/Alkerton in order to assist in meeting the housing needs over the plan period.
- 1.3. My client controls various parcels of land in Stroud District, one such land parcel is located at Claypits, Eastington and is directly adjacent to the recent development of 23 affordable dwellings that has been granted permission and is now being built out under SDC application reference: S.18/2202/FUL.
- 1.4. The current version of the SDLPR identifies Eastington as a settlement that should take significant levels of new housing in light of its size, function and access to services and facilities. However, the site allocations proposed are very limited in scale. For the reasons set out in this representation, our view is that a greater amount of housing should be delivered over the plan period in Stroud District. In order to meet this requirement, there will be a need to widen the settlement boundaries and site allocations at settlements such as Eastington and others that are not currently proposed for expansion.
- 1.5. My clients land at Eastington provides the perfect opportunity to do this, largely due to its sustainability credentials but also as a way of improving the linkages and social aspect of the neighbouring affordable housing development that has been built out.
- 1.6. This representation starts by commenting on the proposed strategy and policies of the plan, to the extent that my client has an interest (Section 2). It then highlights the availability and suitability of the land promoted by my client that should be considered for allocation for housing and/or inclusion within the Settlement Boundary, based on its sustainability credentials and other planning merits (Section 3).
- 1.7. Where necessary, this submission will cross-reference to the evidence base that underpins the SDLPR.

2.0 Representations on the proposed strategy and policies of the Stroud District Local Plan Review

2.1. Representations are made in respect of the general housing strategy and the following policies of the SDLPR, which should be taken as constructive objections. These policies are addressed in the same order in which they appear in the consultation document:

- **Section 2 – The Development Strategy**
- **Section 3 – The Stonehouse Cluster**
- **Section 4 – Core Policies**

Section 2 - The Development Strategy

2.2. **The Vision to 2040** – Whilst it is acknowledged that the Council would wish to make reference to the environmental and social qualities of the area, we consider that there should be much more emphasis placed on the need for economic growth, job creation and new homes to improve the vibrancy of the area and meeting identified needs.

2.3. There should be an acknowledgment of the difficult decisions that will need to be made in delivering the housing and employment land required over the plan period, despite the high quality social and environmental qualities of the District. It is important that the need for new development is made clear, as a balance will need to be made between this and the protection of the social and environmental aspects.

2.4. **The Preferred Development Strategy** - The strategy outlines the need to deliver 12,800 additional dwellings over the plan period. We welcome this commitment to sustainable growth and would go further by suggesting that additional buffers should be incorporated to account for inevitable lapse rates, delays in delivery and under delivery, These factors often plague adopted plans and lead to an undersupply in housing and the need for early review of the development plan.

2.5. We note the suggested Development Strategy refers to a ‘hybrid’ approach, which incorporates various routes to delivering housing need, including site allocations, development at a small number of larger settlements and smaller allocations at some of the larger villages. Other smaller scale development is proposed to be delivered through infill developments within existing settlement boundaries.

2.6. However, we do not consider this to be a robust approach. The reliance of delivering such a large amount of housing at such few locations is a high risk strategy, as the effect of only one of those sites failing to deliver would cause significant shortfalls in delivery.

- 2.7. Furthermore, the inclusion of tightly drawn settlement boundaries (referred to as 'Settlement Development Limits' in the SDLPR), with policy worded so as not to allow any development outside them, is tantamount to a blanket restriction on new housing. This prevents the ability to boost housing supply and sustainable growth, and also prevents potentially sustainable developments from coming forward, which would not be supported purely on the grounds that they are on the wrong side of the boundary line.
- 2.8. We consider that less reliance should be placed upon the main settlements to deliver so much housing and much greater flexibility should be built into the plan to allow housing to come forward at other settlements. This should either involve the removal of settlement boundaries or the rewording of policies that allows sustainable developments to come forward, which are adjacent and in close proximity to the settlement boundaries.
- 2.9. It should also allow smaller scale growth and infill at smaller villages, including within Tier 4 settlements, in order to support the organic growth and vitality of rural communities. The Council would still have the necessary controls to refuse permission on sites that were clearly unacceptable in planning terms. It would, however, free up those sites that are acceptable in all other respects. It is noted that Cotswold District and Tewkesbury Borough Councils' have incorporated such policies in their Local Plan's to support rural communities.
- 2.10. Specifically in relation to Eastington, we note that this settlement has been identified as at Tier 3 settlement and one with potential for growth. We also note that some very small allocations have been suggested to the south-eastern side of the settlement. However, we would suggest that this is proportionately low growth for a settlement of this size and one in such close proximity to Stroud and Stonehouse. Either further allocations should be made at Eastington or the settlement boundary enlarged/made more flexible to encourage further growth. A suggested site is detailed in Section 3.

Section 3 – The Stonehouse Cluster

- 2.11. My client has specific land interests at Eastington and for this reason this part of our representation focusses on the 'Stonehouse Cluster' identified in the SDLPR, which includes the settlement of Eastington (Alkerton).
- 2.12. We note from the Vision for the Stonehouse Cluster that this area is earmarked for growth, as there is a strong economic growth focus to this area. There is also reference to the village of Eastington being allowed to thrive, with services and facilities for young and old people alike. We welcome this aspiration, although we remain unconvinced that

the proposed development strategy adequately allows settlements such as Eastington to truly thrive. This can only be achieved through the allocation of substantial amounts of new housing and employment land in this location, whereas only a small amount is currently proposed. In addition, the plan currently proposes very restrict settlement boundary limits for Eastington.



Currently proposed restrictive settlement boundary for Eastington (Alkerton)

- 2.13. The information in this section refers to protecting sensitive landscapes, conservation areas and key wildlife site, whilst supporting the growth of key services and facilities in the area. However, the land to the north-west of Eastington heading towards the M5 along Claypits Lane is completely free of restrictive land use and environmental constraints. This land therefore provides the perfect opportunity for further growth, which is not currently found in the plan.
- 2.14. We strongly object to the limited amount of development planned for Eastington at this stage and the tightly drawn settlement boundary, which will essentially provide a blanket restriction on new housing and sustainable growth over the plan period. This simply does not comply with the proposed development strategy set out and the Governments objective of supporting sustainable economic growth.
- 2.15. It also does not take in to account the fact that the settlement has now been extended beyond the M5 to the north with the Claypits rural exceptions scheme now being built. This means that the land put forward at Eastington by my client now makes an entirely logical extension to the settlement and would help to social integrate the neighbouring development in to the wider settlement. We would urge the Council to reconsider its approach to Eastington.

Section 4 – Core Policies

- 2.16. **Policy CP2 & CP3 – Development locations and settlement hierarchy** – As set out previously, we welcome the commitment to deliver 12,800 additional dwellings over the plan period and 50 hectares of additional employment land. We acknowledge that some of this development will be included within strategic allocations in Stroud District and on the urban edge of Gloucester. However, we consider that less reliance should be placed on such a small number of locations to meet the majority of the housing need.
- 2.17. Similarly, we object to such a small number of local settlements being incorporated to meet the remainder of the need. This should be widened to include more of the Tier 3 settlement such as Eastington, which are capable of taking a much greater proportion of housing. This will also ensure that rural communities grow organically and their services and facilities remain viable.
- 2.18. Eastington is a larger settlement, with a fair range of public services and facilities. It is very accessible to the strategic road networks and the major settlements of Stroud and Stonehouse. Greater emphasis should be given to allowing more development at settlements such as this.
- 2.19. **Policy DHC1 – Development within defined settlement boundaries** – As set out elsewhere within this representation, we do not consider the use of tightly drawn settlement boundaries to be the most suitable way of ensuring the delivery of sustainable development in the District. If settlement boundaries are to be used, there should be reasonable flexibility incorporated into the policy to allow sustainable forms of development to come forward. This means supporting, in principle, sites adjacent to or in close proximity to such boundaries. Otherwise, this is essentially a blanket restriction on new housing and does not meet the requirement to boost housing supply and sustainable growth as sought by the NPPF. This would render the policy unsound.
- 2.20. We urge the Council to reconsider this policy and at the very least build in more flexibility to allow sustainable development to come forward. The Council would still have the ability to refuse planning permission for those developments that cause demonstrable adverse impacts.
- 2.21. **Policy HC3 – Self-build and custom-building housing** – We object to this policy, the wording of which will not allow the Council to uphold its legal duty to ensure that enough purpose-built self-build plots are delivered to meet the identified need on the self-build register. It is now a legal requirement for Council's to facilitate enough genuine self-build

plots to meet the identified need on the self-built register. However, this policy simply attempts to meet this need by making it a requirement for self-builds to be provided within settlement boundaries and with strategic allocation sites.

- 2.22. This policy simply will not work as anyone proposing new housing within a settlement boundary would not have any incentive to restrict such accommodation to self-build, which would need to be secured by Section 106 Agreement and be subject to restrictions that it would not otherwise need to sign up to. To qualify as genuine self-build, this accommodation needs to be secured as such through legal agreement. Otherwise, it is not a genuine self-build that would count towards meeting the need on its register.
- 2.23. The requirement to delivery self-build within the strategic allocation sites is also unlikely to meet the identified need. Firstly, there will inevitably be delays with larger sites, which often take significant periods of time to come forward. Secondly, it is unlikely that large-scale house builders will be prepared to offer up plots on land that they control for others to build. This is completely at odds with their role as a housebuilding service.
- 2.24. **Policy HC5 – Replacement dwellings** – The proposed policy on replacement dwellings sets out a list of criteria, all of which must be met for such replacements outside of development settlement boundaries to be approved. We assume there is a drafting error at Criterion 2, which suggests that a replacement dwelling will only be allowed if the existing building is a designated or non-designated heritage asset? We can only assume the intention is that such heritage assets will be protected and that only the replacement of existing dwellings that do not have such designations will be supported.

3.0 Promotion of land at Claypits Farm for housing

3.1. This section provides a site-specific representation for the promotion of land on the north-eastern side of Claypits Lane, Eastington, located on the western edge of the Eastington/Alkerton settlement. This land is promoted for inclusion as a specific housing allocation or for inclusion within an extended Settlement Boundary around Alkerton.

3.2. The full site address details and land use data is set out as follows;

Promotion site: Claypits Farm, Claypits Lane, Eastington, Stroud, Gloucestershire

Total site area: Circa 2.5 hectares

Developable area: Circa 1.2 hectares (as shown on concept masterplan)

Site capacity: 28-32 dwellings (roughly 25 dph)

Planning history: None directly relevant to this site but the recent development of the neighbouring land for 23 affordable homes is highly relevant

Land use status: Greenfield land - No environmental or landscape designations
Flood Zone 1 (lowest risk)

Delivery timescales Immediate – 0-3 years

3.3. Although the whole land parcel is promoted, the following plans show how a proposed allocation/enlargement to the Eastington Settlement Boundary might come forward on a smaller area of the land, to fit in with neighbouring development. The site is shown in the context of the neighbouring exceptions scheme of 23 dwellings granted in 2019.



- 3.4. The applicant has also commissioned an initial masterplan showing how the site might be developed in a way that would integrate into the framework of the neighbouring development and the wider settlement. A full copy of this concept masterplan is included at **Appendix 1**. It should be noted that this is simply a concept plan for illustrative purposes and should not be taken as a firm layout for a development proposal.



- 3.5. This masterplan shows a development of between 28-30 dwellings, which would be of similar size and density to the neighbouring affordable housing scheme and would be of a scale that would not affect the social cohesion of Eastington/Alkerton. This is based on a density of around 25 dwellings per hectare (dph), which is a relatively low density and commensurate with its surroundings. A development of this size would appear as an organic extension to the settlement, with frontage onto Claypits Lane, and would help to integrate the neighbouring affordable scheme into the context of the wider settlement.
- 3.6. Ultimately, this site has the potential to assist in meeting the significant housing requirement set out in the SDLPR up to 2040 and Eastington has been identified as a settlement that will need to take a proportion of this growth.
- 3.7. The respondent requests that this site be included within any future Strategic Housing Land Availability Assessment (SHLAA) and/or Call for Sites process that comes through the Local Plan Review process.

The Promotion Site and its Context

- 3.8. The site relates to an infill plot of presently undeveloped agricultural land between the settlement of Eastington and the A38 from Bristol to Gloucester. The site comprises of a roughly square shaped parcel of 2.5 hectares in total, although the developable area has been shown as roughly half of that at 1.2 hectares (see above concept masterplan).
- 3.9. The land is located on the north-eastern side of Claypits Lane and to the north-western side of the M5 motorway, which separates the land from the main Eastington settlement. The site is outside the defined Settlement Boundary as defined by the existing Adopted Stroud District Local Plan to 2031 and the Eastington NDP. However, the land sits immediately adjacent to the affordable housing scheme of 23 dwellings that was granted by the Council in 2019 and is now at an advanced stage of its construction.
- 3.10. Further linear residential development is located to the north-west of this land along Claypits Lane and several commercial uses occupy land on the southern side of the lane. Due to the recent neighbouring development, the immediate surroundings when viewed from the A38 and Claypits Lane, now very much has the appearance of a built up/semi-built up area, rather than a semi-rural location as it once was. The land is relatively flat and is bordered by mature hedgerows at each side.
- 3.11. Importantly, the decision to grant planning permission for the 23 affordable homes represented an expansion of the settlement beyond the M5, which previously provided a strong boundary. The effect of this is that the development of 23 dwellings appears to have extended the village, thus offering the opportunity to provide a sensitive development between the affordable scheme and the lower-density linear form of development along Claypits Lane heading north-west.
- 3.12. The land is not within an area of Green Belt and is within Flood Zone 1 (low risk) as defined by the Environment Agency's most up-to-date flood risk maps. The site is not located within any national or local landscape designation, and there are no heritage assets or other constraints restricting the development of this land.
- 3.13. The site is well connected and can make the most of the good transport infrastructure, which provides good connectivity along the A38 and to the main settlement of Eastington/Alkerton. The site is within 800 metres of Alkerton Cross and the Community Centre, as well as local shops and the primary school. The site is also reasonably close to Stroud and Stonehouse, where key primary services and facilities are available. e.g. primary and secondary schools, employment opportunities, community facilities, shops, sports facilities and public transport. The land is also easily accessible by the M5 (J13).

Suitability and Availability of the land

- 3.14. Given the level of development that Stroud District will be required to deliver over the extended plan period to 2040, difficult decisions will need to be made about where to locate new housing and employment land. A significant amount of this development will inevitably need to be delivered on greenfield land, which will undoubtedly cause a degree of visual change to certain settlements and landscapes. It will also inevitably result in the growth of smaller settlements, as well as larger ones.
- 3.15. The implications of development must be balanced against the need for new housing and the social and economic benefits that would arise from this. The use of greenfield land is an inevitable consequence of the need to provide enough housing and jobs over the plan period.
- 3.16. The promotion site at Claypits Lane is excellently located towards the edge of the large settlement of Eastington, and directly adjacent to a new housing site that was supported by the Council for the provision of much needed affordable housing. The existence of this neighbouring development, together with the low-density linear development to the north-west along Claypits Lane, means that the infilling of this land with additional development makes for a logical and organic extension. The development of this site would read well in the wider context, as demonstrated through the concept masterplan
- 3.17. As was found with the neighbouring site, the land is within acceptable walking and cycling distance of the public facilities and services that Eastington has to offer, which includes shops, a primary school and a community building. It is also within relatively short distance of the much larger settlements of Stroud and Stonehouse, which accommodate the full range of public services and facilities. The site also has good access to the strategic network along the A38 and M5.
- 3.18. Given that Eastington has been identified as a settlement that will be required to take specific site allocations for housing, it is considered that the promotion site should be considered as an additional site for inclusion in the Development Plan. Eastington is more than capable of absorbing the additional 28-32 dwellings as shown on the masterplan.
- 3.19. In terms of the availability and deliverability of the land, the site is within single ownership and my client has a promotion agreement on the site and the opportunity to purchase upon its allocation for housing or upon the grant of planning permission. The site is therefore readily available to develop now and it is anticipated that the site could be completed within 1-3 years. The site therefore has the potential to assist the Council in meeting its rolling 5-year housing land supply requirement.

The social benefit of allocating this site for housing

3.20. There are two key social benefits arising from the proposed delivery of this site for housing. Firstly, it would deliver 30% affordable housing across the site, thus yielding around 10 additional much needed affordable homes in this part of the District. Secondly, and perhaps more pertinently, it would de-isolate the recent adjoining development of 23 affordable homes from the rest of the settlement and would help to ensure a mix of housing tenures, which is so important for successful social integration.

3.21. Whilst the delivery of 23 affordable homes on the neighbouring site should be applauded in terms of meeting an identified need, it is far from ideal that all 23 units are delivered on a contained site, without a mix of social and market units. All good developments should have an inclusive and mixed community. This can only be achieved by delivering a market led development on this adjacent site. The contribution of a market led development here, with a proportion of integrated affordable housing, and the full affordable scheme next door, will ensure a balanced and mixed community overall.

This will result in significant social benefits. We consider that this factor alone should be enough to warrant the allocation of the land for housing.

Landscape and Visual Implications

3.22. As explained previously, there are no specific land use, policy or environmental designations that would prevent the delivery of this site for housing. Considering that around 50% of Stroud District comprises of land within the Cotswolds AONB, there is a strong pressure to be able to meet the majority of Stroud's housing needs on land outside this designation and that includes the land at Eastington and its environs.

3.23. The land in question is not considered to have such landscape or environmental quality as to prevent development from taking place. This is consistent with the outcome of the neighbouring planning application for 23 dwellings on the site, where the Officer's Report makes it clear that there were no overriding concerns over the development of that greenfield land for housing. It is acknowledged that this was determined in the context of it delivering affordable housing. Nevertheless, it is clear that the visual and landscape implications of development weighed very insignificantly in the overall planning balance.

3.24. The limited landscape value of the site is also alluded to in the Council's Landscape and Visual Study that forms part of the Local Plan Review evidence base. Although the current promotion site is not specifically assessed, other parcels around Eastington are assessed and those parcels nearest to the application site were found to have only a

'Medium' landscape and visual value. It could be reasonably concluded that the proposal site would similarly attract the same rating, which would not prevent development.

- 3.25. We conclude that there would be no overriding landscape or visual harm arising from the development of this land, especially when considered in the context of the need for the allocation of substantial amounts of new housing and in acknowledgement of the fact that a large majority of that housing will need to be delivered on greenfield land.

Other technical matters

- 3.26. The NPPF seeks to direct new developments to areas at the lowest risk of flooding (Flood Zone 1). The site is located in Flood Zone 1 as defined by the Environment Agency's Flood Maps, which comprises land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (0.1%).
- 3.27. The site is therefore not considered to be at risk of flooding in itself, and its development would not increase the risk of flooding to third party land. The development is therefore acceptable in principle and there is no reason why a suitable suite of sustainable drainage techniques could not be provided to address this matter.
- 3.28. There are unlikely to be any highway safety issues arising from the development of this site. The site has frontage on to Claypits Lane, which is a straight road with adequate visibility splays in both directions. No access concerns were raised with the neighbouring development for 23 dwellings. The proposed access is located a reasonable enough distance away from the neighbouring access so as not to cause a conflict with vehicles entering and leaving those respective sites.
- 3.29. Any future planning application would be accompanied by a detailed transport assessment, detailed access plans and swept path analysis of the internal road layout. However, there is no reason to suspect that a safe and convenient access cannot be provided. The site also has good pedestrian connectivity to the wider settlement, with a footpath running along the front of the site to the main village centre.
- 3.30. There are no known concerns in relation to air quality, noise pollution, land contamination and ecology. Furthermore, it is not anticipated that archaeology or other heritage assets would significantly affect the development of this site. The masterplan shows that acceptable levels of green infrastructure can be delivered and there is further land available should further public open space and landscaping be required.

4.0 Conclusions and Recommendations

Conclusions and recommendation on the strategy and policies of the SDLPR

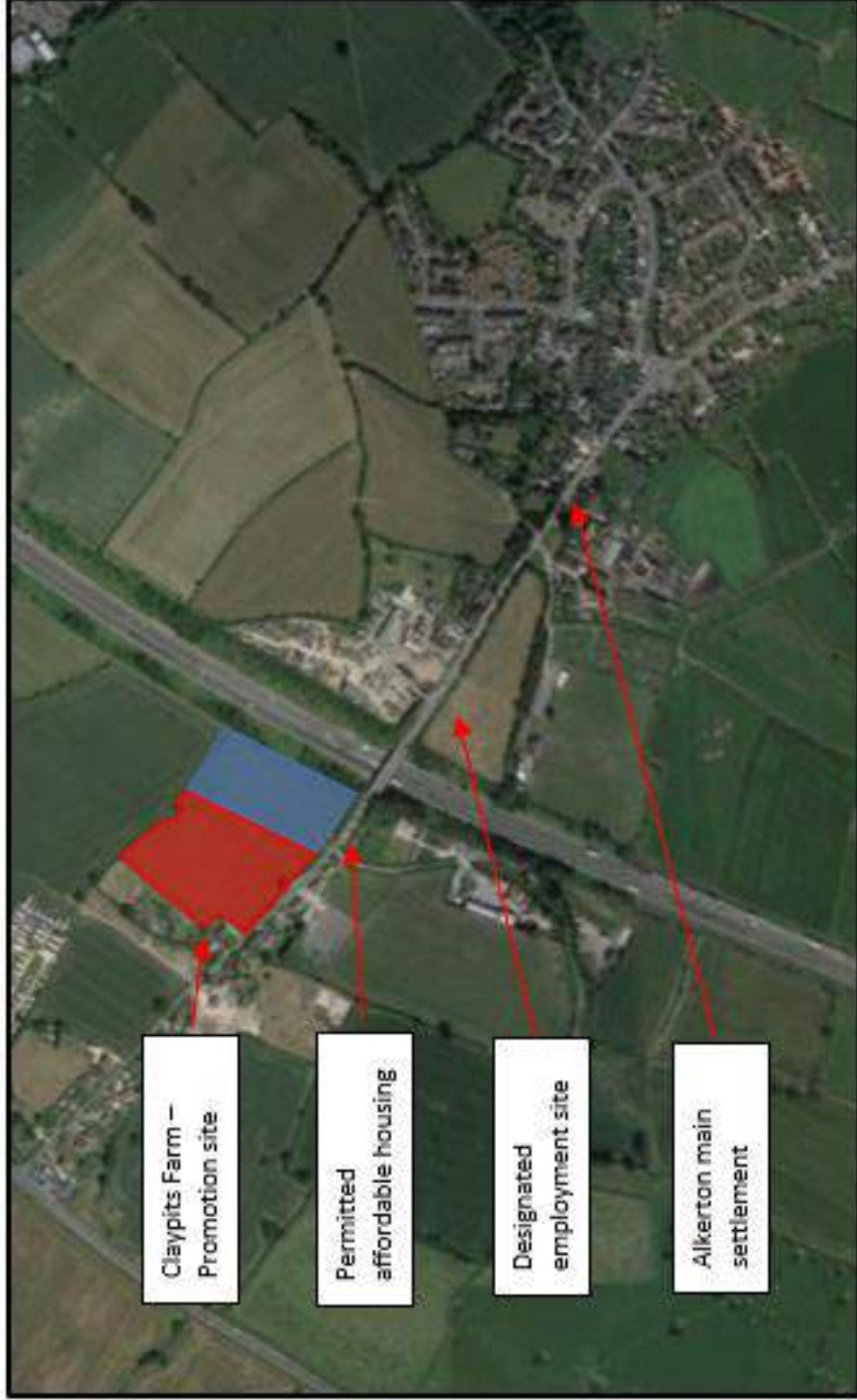
- 4.1. We welcome the SDLPR strategy that identifies the need for a substantial amount of new housing over the updated plan period. However, we consider that the provision of the identified 12,600 additional homes should be more evenly spread across the District, rather than limiting the spread of development to only the larger settlements in the District. Further growth should also be facilitated in order to take in to account the inevitability of lapse and failure rates of delivery.
- 4.2. We welcome the acknowledgement in the plan that Eastington is classed as a Medium/Large Settlement, and that this settlement should take some of the housing growth envisaged over the plan period. However, we are concerned that the amount of housing actually proposed at Eastington through the site allocations is proportionally nowhere near enough. Given the size of the settlement, its proximity to Stroud and Stonehouse, and the services and facilities it has access to, we consider that Eastington is able to take a substantially greater amount of new housing.
- 4.3. Furthermore, the existing settlement boundary around the original hamlet of Alkerton, is simply too tightly drawn and the strategy to not increase this settlement boundary would be a mistake in our view. Providing tightly drawn settlement boundaries, with no flexibility in policy to develop outside them, is essentially an attempt to impose a blanket restriction on new development. This approach is incompatible with the NPPF's requirement to significantly boost the supply of new housing.
- 4.4. The tight drawing of settlement boundaries also potentially prevents sustainable forms of development coming forward, that may otherwise be perfectly acceptable. We consider that the Council should re-consider its strategy by either significantly widening settlement boundaries to facilitate more housing or provide greater flexibility in the housing policies to allow development that is adjacent to settlement boundaries to come forward, where it can be demonstrated that such development is sustainable.
- 4.5. Without these changes, my client is concerned that the SDLPR will be found to have not been positively prepared, justified or consistent with national policy. We would strongly urge the Council to re-consider their limited approach to new housing in Eastington, which is a completely unconstrained location and one that is more than capable of absorbing significantly higher levels of new development.

Conclusions and recommendations on the suitability of Claypits promotion site

- 4.6. We conclude that the promotion land at Claypits Farm, Claypits Lane, Eastington provides the optimum location for additional housing growth for both this settlement and the wider District to assist in meeting the housing need in Stroud over the plan period. The land is within single ownership and is available for development now.
- 4.7. It would make for the most logical extension to Eastington, particularly since the abutting affordable housing scheme for 23 dwellings that was approved in 2019 and is been built out now. The land is flat, contained and does not cause any harm to the setting of the AONB. In fact, the provision of additional development here will make that neighbouring development appear and feel less isolated and will provide a more integrated social balance between market and social accommodation. It will also lessen the harsh urban edge created by that development, as well as its lack of landscaping and active frontage.
- 4.8. The evidence available demonstrates that this location is of low landscape and visual sensitivity and the site is relatively well related to the main settlement. The site is within safe and convenient walking distance of the majority of services and facilities that Eastington has to offer. The site is within 800 metres of Alkerton Cross and the Community Centre, as well as local shops and the primary school.
- 4.9. Furthermore, the site is reasonably close to Stroud and Stonehouse, where key primary services and facilities are available. e.g. primary and secondary schools, employment opportunities, community facilities, shops, sports facilities and public transport. The land is also easily accessible by the M5 (J13).
- 4.10. The site benefits form adequate access visibility on to Claypits Lane meaning that safe and suitable access can be provided on to the public highway that meets with local and national highway safety standards. The site is also served by a footpath leading straight to the main settlement. In addition, the land is not sensitive from an ecological, archaeological or pollution perspective. These same conclusions were reached on the neighbouring site for the 23 affordable homes.
- 4.11. This representation demonstrates that the allocation of this site will assist in meeting the housing need of the District over the plan period and would generally accord with the proposed strategy for achieving this. It would provide for the logical and sustainable growth of this settlement and we therefore strongly urge the Council to allocate this site.

APPENDIX A

Site context map of Claypits Farm and Eastington



Claypits Farm -
Promotion site

Permitted
affordable housing

Designated
employment site

Alkerton main
settlement

APPENDIX B

Proposed concept masterplan
for Claypits Farm, Eastington

All dimensions to be checked on site by contractor prior to preparation of shop drawings and commencement of work on site.

Do not scale from this drawing.

This drawing and the copyrights and patents therein are the property of Apex Architecture and may not be used or reproduced without consent.

This drawing is to be read in conjunction with all relevant consultant drawings/documents and any discrepancies or variations are to be notified to Apex Architecture before the attached work commences.

SITE PLAN LEGEND

- PROPOSED DWELLINGS
- EXISTING BUILDINGS
- PUBLIC OPEN SPACE
- LANDSCAPING
- ORCHARD
- SITE AREA
- PRIMARY ROAD
- SECONDARY ROAD



Oak House, Avilton, Gloucestershire, GL15 6ST 01594 516161
Wydstone Business Park, Nommouth, NP25 3SR 01600 800101

Client: AMPM

Project:
Land at Claypit Farm
Easington, Stonehouse
Gloucester, GL10 3AJ

Title: Proposed Site Plan CONCEPT

Job No	Drawing No	Revision
AA480cf	100	N/A
Scale	Issue	Date
1:1250 @ A2	DISCUSSION	JAN 2020

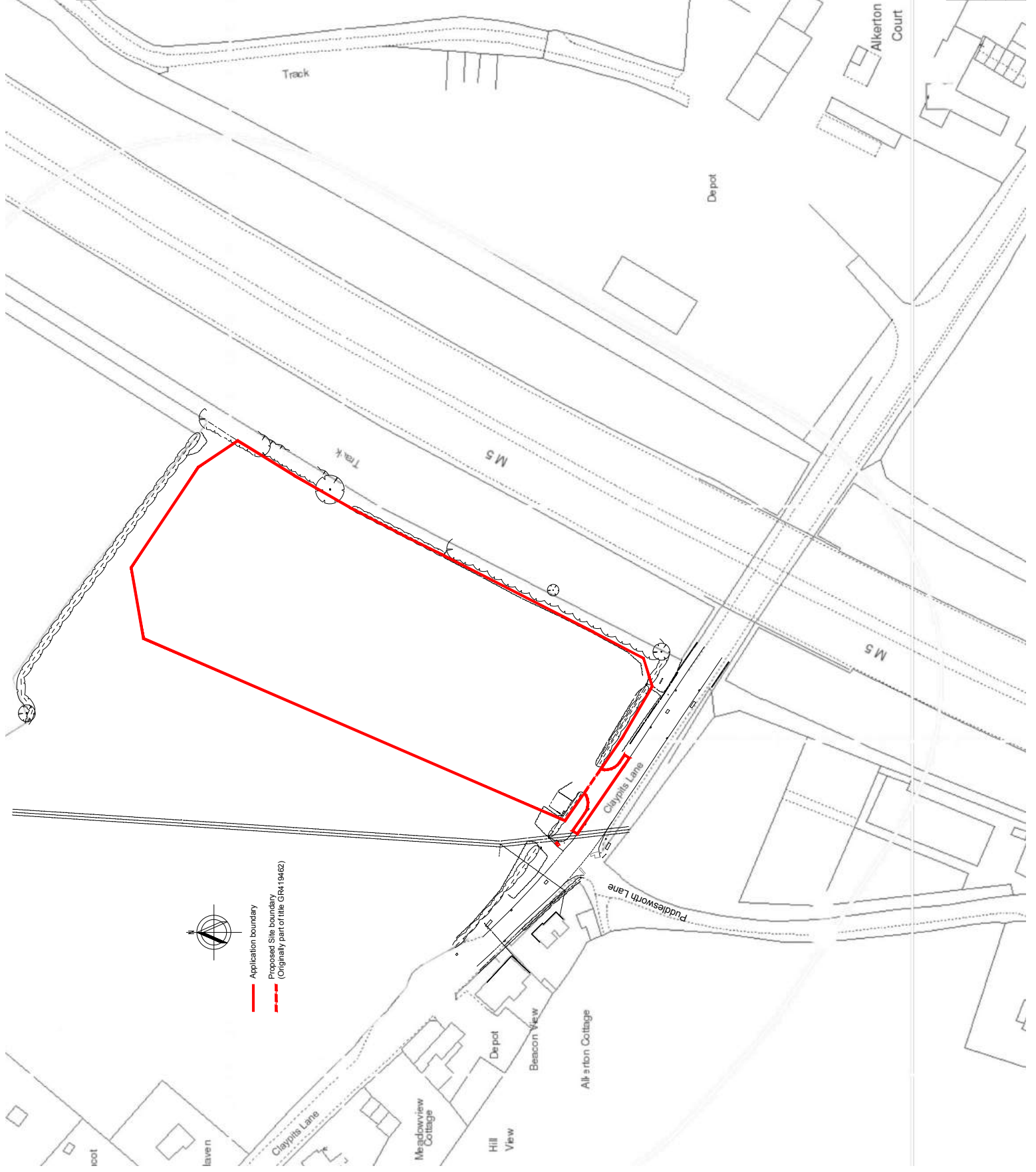
www.apexarchitecture.co.uk enquire@apexarchitecture.co.uk

APPENDIX C

Approved site layout plan and committee report
for Claypits Lane affordable housing (23 dwellings)
SDC Ref: S.18/2202/FUL

NOTES:
 1. Some dimensions taken from the drawing.
 2. All dimensions are in millimetres unless otherwise stated.
 3. All dimensions are to the centre of the line unless otherwise stated.
 4. All dimensions are to the outside of the line unless otherwise stated.
 5. All dimensions are to the inside of the line unless otherwise stated.
 6. The location of this drawing is with the architect.
 7. All dimensions are in millimetres unless otherwise stated.

REVISIONS	Planning Issue	26.09.18
A		



- Application boundary
- - - Proposed site boundary
- - - Originally part of title GR41 9482



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PROJECT:	EASTINGTON COMMUNITY LAND TRUST
DWG TITLE:	SITE LOCATION PLAN
SCALE:	1:250 @ A3
DRAWN:	RJW
CHECKED:	
DWG NO:	16.106.80
REV:	A
DATE:	26.09.18

NOTES:

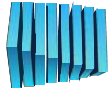
1. The information on this drawing is for the use of the client and is not to be used for any other purpose without the written consent of the architect.
2. The architect is not responsible for the accuracy of the information provided by the client or for the accuracy of the information provided by any other source.
3. The architect is not responsible for the accuracy of the information provided by any other source.
4. The architect is not responsible for the accuracy of the information provided by any other source.
5. The architect is not responsible for the accuracy of the information provided by any other source.
6. The architect is not responsible for the accuracy of the information provided by any other source.

REVISIONS:

A	Planning Issue	26.09.18
B	Shed and Fence and form benches to Pits 19, 23, 14, 12, 18. Water swale added.	



Proposed Site boundary
(Originally part of title GR419462)



ERIC COLE ARCHITECTURE

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PROJECT	EASTINGTON COMMUNITY LAND TRUST
DWG TITLE	SITE BLOCK PLAN
SCALE	1:500/0/0/1
DRAWN BY	RJW
CHECKED	
DWG NO	16.10.6.90
REV	B
DATE	JUN 2017



STROUD DISTRICT COUNCIL

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Case Officer's Review

Case Officer

Ceri Porter

Application

S.18/2202/FUL

Site Address

Land At,
Claypits,
Eastington,
Gloucestershire

Parish

Eastington Parish Council

Application Type

Full Planning Application

Proposal

23 affordable units for rent and associated infrastructure on existing farm land.

RECOMMENDATION

Recommended Decision Permission Subject to the following conditions:

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason:

To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in all respects in strict accordance with the approved plans listed below:

Dwg. No.002-P3 Existing & Proposed Level Plan – Received 10.10.2018

Dwg. No.003-P7-S2 Proposed Drainage Plan –Received 06.12.2018

Dwg. No.004-P4 Surface Finishes & Kerb Type Plan – Received 10.10.2018

Dwg. No.005-P1 Vehicle Manoeuvres – Received 10.10.2018

Dwg. No.16.106.80 REV A Site Location Plan – Received 10.10.2018

Dwg. No.16.106.100 REV J Site Layout – Received 19.12.2018

Dwg. No.16.106.101 REV J Site Layout With Easements. Received 19.12.2018

Dwg. No.16.106.90 REV B Block Plan – Received 19.12.2018

Dwg. No.16.106.SEC01 REV B Site Sections – Received 19.12.2018

Dwg. No.16.106.AP.01 Apartment Floor Plans – Received 10.10.2018

Dwg. No.16.106.AP.02 Apartment Elevations – Received 10.10.2018

Dwg. No.16.106.HTB.01 REV A House Type B (brick) – Received 10.10.2018

Dwg. No.16.106.HTB.01.01 House Type B (render) – Received 10.10.2018

Dwg. No.16.106.HTB.02 REV A House Type B (render) – Received 10.10.2018

Dwg. No.16.106.HTB.02.01 House Type B (brick) – Received 10.10.2018

Dwg. No.16.106.HTBC.01 House Type B & C– Received 10.10.2018

Dwg. No.16.106.HTC.01 House Type C – Received 10.10.2018
Dwg. No.16.106.HTC.01 REV A House Type D(render)– Received DWG. NO. 10.10.2018
Dwg. No.16.106.HTD.02 House Type D (brick) – Received 10.10.2018
Dwg. No.16.106.HTE.01 House type E – Received 10.10.2018
Dwg. No.16.106.SEC01 REV A Approx site sections & Acoustic Location – Received 10.10.2018
Dwg. No.16.106.SS.01 REV B Street Scenes – Received 10.10.2018
Dwg. No.1621DWG04 Proposed Off site Accessibility Enhancements – Received 06.12.2018

Reason:

To ensure that the development is carried out in accordance with the approved plans and in the interests of good planning.

3. The development shall be carried out in complete accordance with the recommendations contained within the agreed Ecological Design Strategy, by Eastington Community Land Trust, dated 21st February 2019.

Reason:

To protect and enhance the site for biodiversity in accordance with paragraph 175 of the National Planning Policy Framework, Policy ES6 of the Stroud District Local Plan 2015 and in order for the Council to comply with Section 40 of the Natural Environment and Rural Communities Act 2006.

4. Prior to the occupation of the buildings hereby permitted, a landscape and ecological management plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority. The content of the LEMP shall include the following:
 - a. Description and evaluation of the features to be managed.
 - b. Aims and objectives of management
 - c. Appropriate management options for achieving aims and objectives
 - d. Prescription for management actions
 - e. Preparation of work schedule (including an annual work plan capable of being rolled forward over a five year period)
 - f. Details of body or organisation responsible for implementation of the plan.
 - g. Ongoing monitoring and remedial measures.

The LEMP shall include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

Reason:

To protect and enhance the site for biodiversity in accordance with paragraph 175 of the National Planning Policy Framework, Policy ES6 of the Stroud District Local Plan 2015 and in order for the Council to comply with Section 40 of the Natural Environment and Rural Communities Act 2006.

5. The buildings hereby permitted shall not be occupied until the layout, vehicular parking and turning facilities have been provided in accordance with the submitted plan drawing no: 16.106.100 rev J and those facilities shall be maintained available for those purposes thereafter.

Reason:

To ensure that a safe, suitable and secure means of access for all people that minimises the scope for conflict between traffic and cyclists and pedestrians is provided in accordance with the paragraphs 108 and 110 of the National Planning Policy Framework.

6. The buildings hereby permitted shall not be occupied until the proposed off-site accessibility enhancements (Footway and Bus Stop Improvements) have been provided in accordance with the submitted plan drawing no: 1621DWG04 and those facilities shall be maintained available for those purposes thereafter.

Reason:

To ensure that a safe, suitable and secure means of access for all people that minimises the scope for conflict between traffic and cyclists and pedestrians is provided in accordance with the paragraphs 108 and 110 of the National Planning Policy Framework.

7. The vehicular access hereby permitted shall not be brought into use until the existing roadside frontage boundaries have been set back to provide visibility splays extending from a point 2.4m back along the centre of the access measured from the public road carriageway edge (the X point) to a point on the nearer carriageway edge of the public road 120m distant in both directions (the Y points). The area between those splays and the carriageway shall be reduced in level and thereafter maintained so as to provide clear visibility between 1.05m and 2.0m at the X point and between 0.26m and 2.0m at the Y point above the adjacent carriageway level.

Reason:

To avoid an unacceptable impact on highway safety by ensuring that adequate visibility is provided and maintained to ensure that a safe, suitable and secure means of access for all people that minimises the scope for conflict between traffic and cyclists and pedestrians is provided in accordance with paragraphs 108 and 110 of the National Planning Policy Framework.

8. Prior to the occupation of the development hereby permitted the vehicular access shall be laid out and constructed in accordance with the submitted plan drawing no. 16.106.100 rev J with the area of access road within at least 10.0m of the carriageway edge of the public road surfaced in bound material, and shall be maintained thereafter.

Reason:

To reduce potential highway impact by ensuring that there is a safe, suitable and secure means of access for all people that minimises the scope for conflict between traffic and cyclists and pedestrians in accordance with paragraph 108 and 110 of the National Planning Policy Framework.

9. No above ground works shall commence on site until a scheme has been submitted to, and agreed in writing by the Council, for the provision of fire hydrants (served by mains water supply) and no dwelling shall be occupied until the hydrant serving that property has been provided to the satisfaction of the Council.

Reason:

To ensure adequate water infrastructure provision is made on site for the local fire service to access and tackle any property fire in accordance with paragraph 110 of the National Planning Policy Framework.

10. Prior to the occupation of the buildings hereby permitted, the proposed car parking spaces shall be designed to enable future implementation of charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

Reason:

To ensure that the development incorporates facilities for future implementation of charging plug-in and other ultra-low emission vehicles in accordance with paragraph 110 of the National Planning Policy Framework.

11. Throughout the construction period of the development hereby permitted provision shall be within the site that is sufficient to accommodate the likely demand generated for the following:

- i. parking of vehicles of site operatives and visitors;
- ii. loading and unloading of plant and materials;
- iii. storage of plant and materials used in constructing the development;
- iv. provide for wheel washing facilities

Reason:

To reduce the potential impact on the public highway and accommodate the efficient delivery of goods in accordance with paragraph 110 of the National Planning Policy Framework.

12. Development shall be carried out in accordance with the details contained in the Dust Management Plan, dated 09.01.2019 (EG Carter & Co Ltd) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination

Reason:

In the interests of the amenities of surrounding occupiers during the construction of the development.

13. No construction site machinery or plant shall be operated, no process shall be carried out and no construction related deliveries taken except between the hours of 07:30hrs and 18:00hrs on Monday to Fridays, between 07:30hrs and 13:00hrs on Saturdays and not at any time on Sundays, Bank or Public Holidays.

Reason:

To protect the amenity of the locality, especially for the people living/ or working nearby, in accordance with Stroud District Local Plan Policy ES3.

14. No works shall take place on the external surfaces of the building(s) hereby permitted until samples of the materials to be used in the construction works have been submitted to and approved in writing by the Local Planning Authority. Development shall then only be carried out in accordance with the approved details.

Reason:

In the interests of the visual amenities of the area.

15. Prior to occupation of plots 19 to 23 (inclusive) details of the acoustic seating shelters to be provided within their rear gardens shall be submitted to and approved in writing by the local planning authority; and the approved design be insitu and retained thereafter.

Reason:

To ensure a quieter area is provided for these plots in accordance with policy ES3 of the adopted Stroud District Local Plan (November 2015).

Informatives:

1. In accordance with Article 35 (2) the Local Planning Authority have worked with the Applicant. The case officer contacted the applicant/agent and negotiated changes to the design which has enhanced the overall scheme; these have been detailed in the Officer Report.
2. The applicant should take all relevant precautions to minimise the potential for disturbance to neighbouring residents in terms of noise, dust, smoke/fumes and odour during the construction phases of the development. This should include not working outside regular day time hours, the use of water suppression for any stone or brick cutting, not burning materials on site and advising neighbours in advance of any particularly noisy works. It should also be noted that the burning of materials that gives rise to dark smoke or the burning of trade waste associated with the development, are immediate offences, actionable via the Local Authority and Environment Agency respectively. Furthermore, the granting of this planning permission does not indemnify against statutory nuisance action being taken should substantiated smoke, fume, noise or dust complaints be received. For further information please contact Mr Dave Jackson, Environmental Protection Manager on 01453 754489.
3. The proposed development will involve works to be carried out on the public highway and the Applicant/Developer is required to enter into a legally binding Highway Works Agreement (including an appropriate bond) with the County Council before commencing those works.

The construction of a new access will require the extension of a verge and/or footway crossing from the carriageway under the Highways Act 1980 - Section 184 and the Applicant is required to obtain the permission of Amey Gloucestershire on 08000 514 514 or gcchighway@amey.co.uk before commencing any works on the highway.

4. It should be noted that the development proposal is in close proximity to the highway boundary. Highways England (HE) would therefore seek to remind the applicant that it will be important to ensure there is no encroachment into the HE highway boundary and associated landscaping plot during the construction works.

CONSTRAINTS

Article 4 Directive

Consult area

Within 200m of M5

Within 200m of M5

Within 200m of M5

Within 200m of M5

Within 200m of M5

Within 200m of M5

Neighbourhood Plan

Eastington Parish Council

SAC SPA 7700m buffer

HISTORY

Development Control Applications

S.18/2202/FUL

PER

23 affordable units for rent and associated infrastructure on existing farm land. 11.06.2019

Appeal Applications

OFFICER'S REVIEW

BACKGROUND AND INTRODUCTION

MAIN ISSUES

- * Principle of development
- * Design and appearance
- * Residential Amenity
- * Noise
- * Highways
- * Ecology
- * Drainage
- * Obligations
- * Conclusion

DESCRIPTION OF SITE

The application site forms part of an agricultural field located in Claypits, on the edge of Eastington. To the south of the site runs Claypits Lane whilst to the east is the M5 motorway. Claypits Lane crosses the M5 at the south east corner of the site. Beyond the remaining field to the west are residential properties.

The site is relatively flat and enclosed on three sides by mature hedging.

An existing field access is located almost directly opposite the access to Puddleworth on the opposite side of Claypits Lane.

The houses and business of Claypits are predominantly to the south of Claypits Lane with a small group of residential properties to the north.

A public right of way runs along the south eastern boundary, parallel to the motorway.

PROPOSAL

Eastington Community Land Trust (ECLT) has applied for 23 affordable rent homes based on the identified current housing need. A mixture of 2 and 3 bedroom houses and bungalows are proposed plus a two storey apartment building.

The proposed dwellings would be arranged along the highway with bungalows closest to the entrance from Claypits Lane and then a mix of bungalows and two storey along the west side of the road. To the south, an open space including attenuation pond is proposed.

A small orchard area is proposed close to the entrance.

To the rear of plots 15-18 is an access strip to the agricultural fields beyond.

Each property would have at least 2 car parking spaces.

REVISED DETAILS

Revised drainage details
Dust Management Plan
Ecological Design Strategy

MATERIALS

Roof: tiles (slate/clay)
Walls: brickwork/render

REPRESENTATIONS

Statutory Consultees:

Contaminated Land Officer – No comment

LLFA – Following revised drainage scheme – no objection

Eastington Parish Council – Support the application

Policy Implementation Manager – Fully supports application

Highways England – No objection following holding direction issued in respect of drainage.

GCC Highway Authority – No objections subject to conditions

Environmental Protection Manager – No Objections subject to condition regarding dust management plan

Senior Biodiversity Officer – Acceptable subject to conditions

Public: 15 letters of support

Appropriate location
Great community led development
Meeting an identified local need and, with bungalows included, ideal to ensure Eastington residents are able to downsize.
Much needed addition to housing stock

NATIONAL AND LOCAL PLANNING POLICIES

National Planning Policy Framework.

Available to view at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Stroud District Local Plan.

Policies together with the preamble text and associated supplementary planning documents are available to view on the Councils website:

https://www.stroud.gov.uk/media/1455/stroud-district-local-plan_november-2015_low-res_for-web.pdf

Local Plan policies considered for this application include:

- CP1 – Presumption in favour of sustainable development.
- CP2 – Strategic growth and development locations.
- CP3 – Settlement Hierarchy.
- CP4 – Place Making.
- CP5 – Environmental development principles for strategic growth.
- CP6 – Infrastructure and developer contributions.
- CP7 – Lifetime communities.
- CP8 – New housing development.
- CP9 – Affordable housing.
- CP14 – High quality sustainable development.
- CP15 – A quality living and working countryside.

HC4 – Local housing need (exception sites).

EI12 – Promoting transport choice and accessibility.

- ES1 – Sustainable construction and design.
- ES2 – Renewable or low carbon energy generation.
- ES3 – Maintaining quality of life within our environmental limits.
- ES4 – Water resources, quality and flood risk.
- ES6 – Providing for biodiversity and geodiversity.
- ES8 – Trees, hedgerows and woodlands.
- ES12 – Better design of places.
- ES14 – Provision of semi-natural and natural green space with new residential development.
- ES15 – Provision of outdoor play space.

The proposal should also be considered against the guidance laid out in:

Residential Design Guide SPG (2000)

Planning Obligations SPD (2017)

The application has a number of considerations which both cover the principle of development and the details of the proposed scheme which will be considered in turn below:

Eastington Neighbourhood Development Plan (adopted October 2016)(NDP)

Policy EP1: Sustainable Development

Policy EP2: Protect and Enhance Biodiversity and the Natural Environment

Policy EP3: Restoration and Development of the Canal Corridor

Policy EP4: Siting and Design of New Development and Conservation

Policy EP5: Exception Sites

Policy EP8: Traffic and Transport

Policy EP9: Public Rights of Way and Wildlife Corridors

PRINCIPLE OF DEVELOPMENT

Policy HC4 of the SDLP states that planning permission may be granted for affordable housing on sites outside settlement boundaries with Policy EP5 of the adopted NDP supports small scale affordable housing sites at Alkerton provided it meets SDLP policy HC4.

Whilst not immediately adjacent to the settlement boundary, the application site is within 800m of Alkerton Cross and the Community Centre that are identified as important criteria within the NDP for exception sites in the Parish and illustrated on Map 8 (Appendix B, NDP).

In 2012/2013 Eastington Parish Council carried out a Parish Survey part of which identified a need for smaller houses and property to rent. This was followed up by a specific 'Housing Needs Survey' to consider Eastington Parish's own need for both Market and Affordable Housing over the next 5 years. This survey identified an actual requirement for 23 affordable and some market homes, mostly one and two bedroom dwellings.

Eastington is a Tier 3 settlement as defined by the SDLP (a settlement with limited facilities) and the application site is accessible to the range of local services, shops and primary school provided there.

A legal agreement has been submitted and reviewed by the Policy Implementation Officer to ensure that the dwellings will remain available as affordable housing for local need in perpetuity.

DESIGN AND APPEARANCE

The layout of the proposed dwellings has evolved and takes into account the various constraints on the site such as overhead cables, underground cabling and a high pressure gas main.

The constraints result in the proposed dwellings set back from the road with a small orchard to the south east corner. This setting back and intervening planting would soften the appearance of the housing.

The proposed dwellings are of a simple design and finished in materials that are common to the surrounding area.

The apartment building proposed at the end of the street would act as a focal point when viewed from the south.

RESIDENTIAL AMENITY

There are no immediate neighbours within close proximity that could be affected by the proposed dwellings. The distances between, and orientation of, the proposed properties themselves would not result in any loss of privacy or issues of overbearing or overshadowing.

NOISE

The M5 motorway and its associated traffic lie to the south east of the site, set within a cutting.

Mitigation proposes the installation of a noise barrier along the boundary with the M5 comprising of a 1m bund with a 2.5m acoustic fence above along the south eastern boundary with a 2.8m acoustic fence to part of the northern boundary.

In addition to this, the Environmental Protection Manager would wish to see quieter areas provided, such as sheltered seating, for plots 19-23 (those closest to the motorway). These shelters should face north west and be open only on that side. This matter is capable of being addressed via a condition for details to be agreed.

Whilst Environmental Protection also requested the possibility of a further shelter on the land adjacent to Plot 23, this has been discounted due to the various easements in place in this location.

HIGHWAYS

The proposal would use the existing field access point into the site. There is good visibility of 120m in both directions from the entrance and adequate vehicle tracking on the internal road has been demonstrated.

The proposed dwellings would be provided with at least 2 car parking spaces and there would be an additional visitor space for each of the apartments. This is in accordance with the SDLP adopted parking standards.

GCC as Local Highway Authority raises no objections subject to conditions.

A bus stop is located close to the site entrance and the proposal also includes improvement to the hard standing offsite facility and the provision of a new bus timetable. These enhancements would be secured via an appropriate condition.

ECOLOGY

The site currently offers limited ecological value with the most valuable ecological receptors being restricted the boundary hedgerows, buffer planting between the site and the M5 and grassland either side of the existing entrance. There is however scope to enhance the site ecologically post development through a wildlife friendly landscaping scheme and the applicants have submitted an Ecological Design Strategy (EDS). The proposed community orchard is welcomed as our other ecological features detailed within the EDS. A pre-occupation landscape management plan condition is recommended in order for the details of long term management of the green infrastructure of the site to be secured.

The site falls within the identified 7.7km catchment of the Severn Estuary Special Area of Conservation (SAC), Special Protected Area (SPA) and Ramsar and as such it has been identified by Stroud District Council and Natural England that new residential development within the 7.7km catchment has the potential to negatively impact the European site and its qualifying features through increased recreational pressure. Stroud District Council have adopted an avoidance mitigation strategy which allows developers to pay a contribution in order to discharge their duty towards the Habitats Regulations 2017. This will be secured through a section 106 legal agreement

DRAINAGE

The proposed drainage strategy was initially going to utilise underground storage for surface water attenuation however this has been revised to include an open balancing pond. The Lead Local Flood Authority are satisfied with this approach and

Highways England (HE) has been concerned about the drainage affecting their asset and issued a holding direction requiring further drainage information. Following extensive discussions with HE, whilst the development proposal is in close proximity to the highway boundary HE simply stress that it will be important to ensure there is no encroachment into the HE highway boundary and associated landscaping plot during the construction works.

OBLIGATIONS

A S106 ensuring that the dwellings will remain available as affordable housing for local need in perpetuity and setting out how the housing cascade for residents of the Parish of Eastington would work.

Provision of Severn Estuary SAC contribution of £385 per dwelling - £8855

CONCLUSION

The proposal accords with Policy HC4 of the adopted SDLP and the relevant policy (EP5) of the adopted NDP where small scale affordable housing sites at Alkerton are supported provided it meets SDLP policy HC4.

The proposal is not subject to any other overriding environmental or other material planning constraint and therefore, the proposal is recommended for a resolution to grant planning permission subject to the completion of an appropriate legal agreement to secure the above obligations.

REVIEW OF CONSULTATION RESPONSES

It is considered that consultation responses have been responded to within the main body of this report.

RECOMMENDATION

Resolve to permit subject to completion of a S106 agreement

HUMAN RIGHTS

In compiling this recommendation we have given full consideration to all aspects of the Human Rights Act 1998 in relation to the applicant and/or the occupiers of any neighbouring or affected properties. In particular regard has been had to Article 8 of the ECHR (Right to Respect for private and family life) and the requirement to ensure that any interference with the right in this Article is both permissible and proportionate. On analysing the issues raised by the application no particular matters, other than those referred to in this report, warranted any different action to that recommended.

This application has been screened under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 and as it does not fall within either Schedule 1 or Schedule 2 an Environmental Impact Assessment was not required.



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