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Representations on behalf of a private landowner to the  
South Gloucestershire Local Plan Regulation 18  
Consultation: Policies, Sites and Places Development Plan

LAND TO THE WEST OF BRISTOL ROAD, THORNBURY, SOUTH  
GLOUCESTERSHIRE

8 JANUARY 2016

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## INTRODUCTION

This Representation is submitted by Colliers International on behalf of a private landowner, in relation to land to the west of Bristol Road, Thornbury, South Gloucestershire. Colliers International is instructed to promote this land through the Local Plan making process. The site is 6ha of agricultural land adjacent to the now out of date settlement boundary of Thornbury.

These representations are made in response to the South Gloucestershire Local Plan Policies, Sites and Places Plan Regulation 18 Consultation (November 2015).

In answering the specific questions posed by the consultation, these representations draw attention to the requirements for plan making set out in the National Planning Policy Framework (NPPF) tests of soundness and the Duty to Co-operate legal and procedural requirements.

QUESTION 1: IF COMMENTING ON A PARTICULAR SITE,  
LOCATION, RURAL VILLAGE OR SETTLEMENT PLEASE  
STATE WHICH?

LAND TO THE WEST OF BRISTOL ROAD, THORNBURY, SOUTH  
GLOUCESTERSHIRE

LOCATION AND DESCRIPTION OF THE SITE

The land is currently in agricultural use and has in the past occasionally been used to host community Fun Fairs, amongst other things. The site is located within the green belt t. A proportion of the site falls within Flood Zone 3 and as such reduces the net developable area to approximately 4 hectares.

Adjacent land uses: The eastern boundary of the site is adjacent to Bristol Road, which leads the short distance to the vibrant Thornbury town centre. The proposed site is also well connected to Thornbury Leisure Centre and Tesco Supermarket, which are both located on the opposite side of Bristol Road and easily accessible by public footpaths. The site adjoins Thornbury Golf Club to the west and the access road to the golf club forms the southern boundary of the site. Thornbury allotments are adjacent to the northern boundary of the site, with the High Street located beyond that. As the site is served by Bristol Road it allows easy access to the A38, which provides excellent links to Bristol and Gloucester, as well as the M4 towards Cardiff and London and the M5 for Birmingham and the wider South West.

QUESTION 2: IT IS CONSIDERED THAT THE DEVELOPMENT  
INDUSTRY'S ABILITY TO DELIVER AN ANNUAL SUPPLY OF  
2,100 HOMES PER YEAR IS NOT FEASIBLE OR PRACTICAL,  
THEREFORE DO YOU SUPPORT THE COUNCIL'S  
APPROACH TO CALCULATING THE 5 YEAR HOUSING  
REQUIREMENTS?

No. The issues relating to undersupply has been largely due to the complexities of seeking to deliver the bulk of housing on two large allocations on complex strategic sites requiring either significant preparatory infrastructure or complex remediation and the sale of a significant brownfield site. North Yate extension has stalled for a variety of reasons relating to the significant scale of required infrastructure improvements whereas Filton Airfield has stalled through matters relating to both site ownership and acquisition/disposal and unrealistic aspirations over value and significant unknown site remediation risks. Had advice from the market at the Core Strategy Examination in Public been heeded, a greater amount of smaller strategic sites would have been brought forward in a planned manner, as demonstrated by the market delivering a significant number of these previously promoted sites as speculative planning applications - most notably to the northern fringe of Thornbury. Therefore it is not our view the development industry cannot deliver an annual supply of 2100 homes per year.

The National Planning Policy Framework paragraph 47 sets out the imperative to boost significantly the supply of housing. The plan will not be consistent with national policy, and is therefore unsound, if the full objectively assessed need for housing is not delivered, especially if any revised target for delivery is artificially constrained by the Council's unfounded assertion that the development industry is at fault.

The rationale to lower the target for 5 year supply will not deal with the under supply of housing and will lead to a widening of the gap. If the Council allocate the correct sites in locations where the market would deliver much needed housing the assertion that increasing the target would "*inflate the annual requirement to in excess of 2,100 units and result in a housing target that cannot be achieved*" is counterproductive and inconsistent with the NPPF.

The council must consider addressing this as soon as practicable as it will result in further under deliverability over the course of the plan period. There is a risk that the gap between the shortfalls of homes projected to be delivered over the next five years will widen. As things stand the council can demonstrate that there are 10,500 dwellings with outline, full, or reserved matters planning permission or have been built since 2006. This is not a plan led approach, it is reflective, and this goes to the heart of the soundness in that the plan is not positively prepared.

The Sedgefield method has been routinely preferred by Inspectors over the Liverpool method and this should not be abandoned because there are adequate sites that can be brought forward if the Council make the appropriate numbers of allocations via this plan making process.

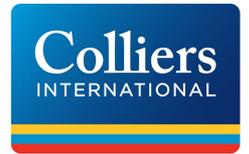
### QUESTION 3: CAN THE MARKET SUPPORT ADDITIONAL SITE ALLOCATIONS IN THESE TOWNS?

It is acknowledged that the council have considered Thornbury as a sustainable location for development. The land to the West of Bristol Road, Thornbury is capable of coming forward, however the council will need to consider a green belt review. Whilst the whole site is within the Green Belt, it performs no function associated with the reasons why land should be located in the Green Belt. The whole site is surrounded by development and the nearest settlement to the site sits beyond Thornbury Leisure Centre and other residential and leisure developments.

The Rural Settlements and Villages 2015 Topic Paper: Sustainable Access to Key Services and Facilities & Demographic Information (November 2015) assessed 54 village and settlements out of these 54 settlements Yate and Thornbury was ranked the highest in terms of access to key services and facilities. The land to the west of Bristol Road is conveniently located only 0.2 miles away from Tesco Superstore, with Aldi a further 500m further towards the town centre. Thornbury High Street and the St Mary Shopping Centre, both within 0.3 miles from the site, is a thriving Town Centre consisting of convenience shops, opticians, doctors surgery, bakeries, pharmacies, clarity shops, pubs, restaurants and cafes. Thornbury Leisure Centre is located across the Bristol Road from the proposed development site and the site is bounded by Allotments and a Golf Course Centre.

The site benefits from being within the catchment of a number of Primary Schools, Gillingstool Primary School is a ten minute walk from the site, with New Siblands and Crossways infant and junior schools only one mile away. The Castle School Secondary School is located 20 minutes' walk from the proposed development site and any development will also be within the catchment for Marlwood School in Alveston, which is 5 minutes by car.

The land to the west of Bristol road offers the potential to deliver approximately 80 dwellings in arguably the most sustainable location in South Gloucestershire. Land to the west of Bristol Road would represent an appropriate extension to the existing built up area of Thornbury and will be clearly defined by defendable boundaries-with the eastern boundary of the site is adjacent to Bristol road, which leads the short distance into the town centre. The site also boasts excellent access out of Thornbury, to the south, which allows further access to the A38 facilitating excellent links to both Gloucester and Bristol principally, as well as Cardiff and London, as can be seen from the accompanying site location plan, attached at Appendix 1.



With the above in mind it is agreed that Thornbury could support our site could as an allocations and the development of a further 80 dwellings here would represent an appropriate extension to the existing built up area of Thornbury and would not greatly impact on the existing infrastructure. The southern fringe of Thornbury is the most sustainable location for an allocation.

## QUESTION 4: WILL ADDITIONAL ALLOCATIONS IMPACT ON THE PLANNED CONSTRUCTION RATES OF EXISTING ALLOCATED SITES IN THESE TOWNS?

Additional allocations are required. Planned construction rates on existing allocated sites would only become affected if sites were deemed to be competing with one another within housing market sub-areas. Developers will acquire sites with prospect of achieving planning permission in areas they have little or no presence. South Gloucestershire is fortunate insofar as the District is large and has a number of housing sub-areas where developers seek to have sites. Each of the following locations, for example, can be considered to have their own housing market sub-areas: Thornbury, Yate, Charfield, Lyde Green, Pucklechurch, Westerleigh, Frampton Cotterell, Siston, Emersons Green and Oldland Common. It would not be uncommon for a PLC to have a number of sites across each of these locations – as evidenced by the previous consultation and call for sites.

Additional land should be allocated to ensure flexibility of supply and sustainable locations should be considered to be first priority in selecting further sites for allocation. The housing market is vibrant in South Gloucestershire and additional site allocations within Thornbury would allow people to have a choice of the type of home and setting to live and work. The land to the west of Bristol road would contribute to the shortfall of housing in the five year housing land supply.

## QUESTION 5: WHAT COMMENT DO YOU HAVE ON THE COUNCIL'S APPROACH TO ENSURING IT CONFIRMS WITH THE DUTY TO CO-OPERATE (DTC)?

At paragraph 7.1 the council have acknowledged the principles of 'Duty to co-operate'. Section 110 of the Localism Act states "requires that councils and public bodies 'engage constructively, actively and on an ongoing basis' to develop strategic policies'. Although we agree that the council have acknowledged the principles of 'Duty to co-operate' there is no evidence to show how the council will engage with **all** neighbouring authorities over the issues of housing supply and it is not clear that there are any objectives of what they hope to achieve if they do engage any other LPA's. This is particularly disappointing when at question 2 the Council have made the assertion that the FOAN is unlikely to be achievable within the confines of the Authority.

The Planning Practice Guidance online resource describes the Duty to Cooperate at Paragraphs: 001, 002, 003, 012, 017 and 019.

Paragraph 001 Reference ID: 9-001-20140306

- The Duty to Cooperate is not a duty to agree
- Local Planning Authorities must be able to demonstrate how they have complied with the Duty; and
- ....cooperation should produce effective and deliverable policies on strategic cross-boundary matters.

Paragraph: 002 Reference ID: 9-002-20140306

- The Duty to Cooperate is separate from but related to the test of soundness.

Paragraph: 003 Reference ID: 9-003-20140306

- Although the Duty to Cooperate is not a duty to agree, LPAs should make every effort to secure the necessary cooperation on strategic cross- boundary matters before submission. Refusal by one authority to co-operate should not prevent the plan-making LPA from submitting. But it must show robust and comprehensive evidence of the efforts made to secure co-operation.

Paragraph: 012 Reference ID: 9-012-20140306

- Cooperation should take place throughout Local Plan preparation, starting with initial evidence gathering and continuing through to strategy development and submission and looking beyond into delivery and review. Failure to demonstrate compliance with the duty cannot be corrected after submission.

Paragraph: 017 Reference ID: 9-017-20140306

- LPAs who want to agree a joint planning strategy but are not submitting plans in the same broad timeframe should try to enter into formal signed agreements, demonstrating commitment to an agreed strategy on cross-boundary matters.

Paragraph: 019 Reference ID: 9-019-20140306

- If the plan's proposals cannot be delivered because the LPA has been unable to secure co-operation from others, Inspectors will look for robust evidence to show that the Council has done all it can in that respect.

As currently presented the Council have not demonstrated that they have consulted with any neighbouring authority, what they consulted on, whether there is a clear vision underpinning the consultation and whether their objectives have been met through opening dialogue with the neighbouring authorities. Therefore it cannot be said that the Council appears to have met the requirements for the Duty to Cooperate.

QUESTION 6: TO ENSURE DELIVERY WITHIN A 5 YEAR  
TIMESCALE, DO YOU AGREE WITH THE 150 LIMIT AND THE  
BASIS FOR HOW THE COUNCIL HAS ARRIVED AT THIS?

No. The Council have set this limit arbitrarily. Each site presents its own case and has very distinct profile of ownership, technical and non-technical constraints and each of these will impact on the deliverability and likelihood of being deliverable within 5 years. Sites with more than one developer for example may deliver twice as many houses as a site with one developer. Equally, a site with multiple ownerships may take longer to complete a disposal than a site in single ownership.

Currently the longest part of any process of site delivery is S106 negotiations and that is regularly constrained by Council resourcing as opposed to landowner or developer issues. That being said, more generally a straightforward site following allocation for housing takes under a year to submit a planning application and will begin to deliver towards the middle of year 2. A single developer might deliver at a rate of two/three dwellings per month and sites with two developers double that rate, etc

Allocations of sites between 50 and 200 dwellings for single developers should be considered appropriate. Any sites beyond 250 dwellings are unlikely to be fully built out within five years however they should not be discounted as those not requiring significant infrastructure improvements will be able to contribute to the delivery of housing as much as any site up to 150 dwellings..

## QUESTION 7: DO YOU HAVE ANY COMMENTS ON THE SOUNDNESS OF THIS SEQUENTIAL APPROACH FOR ASSESSING POTENTIAL HOUSING SITES?

Paragraph 16.1 identifies the North and Eastern Fringes of Bristol (including brownfield land) and the market towns of Yate & Chipping Sodbury and Thornbury, as the areas with the best access to key transport, services, facilities and employment and directs future development towards those sustainable locations. Other locations within South Gloucestershire are also capable of being considered sustainable, however it is agreed that the principle settlements can contribute more readily than some of the peripheral towns and villages.

We support the recognition by the Council that these existing built up areas offer the greatest opportunity to deliver additional housing. The land to the west of Bristol is located in Thornbury and is well located to benefit from existing key services, excellent transport connectivity and benefits from being situated within walking distance from the town centre.

The sequential approach taken to assess locations and sites for further housing allocations needs to consider the sustainability criteria and the performance of each site when considered against those. Paragraph 16.4 should go further that stating *"if it is not possible to find sufficient sites to meet the 5 year land supply shortfall then consideration will need to be given to whether this constitutes grounds to consider Green Belt sites, including a Green Belt review to test how the area contributes to the national Green Belt purposes"* by stating a commitment to measuring sites in the Green Belt against both their performance within the Green Belt and also each site's performance against sustainability criteria set out in the NPPF.

We strongly encourage South Gloucestershire to consider a full Green Belt review because the most appropriate sites for development to assist with meeting the gap in housing land supply can be found to be inappropriately designated within the green belt. In order for the land west of Bristol road to be bought forward for development and it must be removed from the Green Belt.

QUESTION 8: DO YOU CONSIDER ANY OTHER RURAL  
VILLAGES OR SETTLEMENTS SHOULD BE SUBJECT TO  
THE SUSTAINABLE ACCESS TO KEY SERVICES AND  
FACILITIES ASSESSMENT?

No.

QUESTION 9: DO YOU AGREE WITH THE RANGE OF KEY  
SERVICES AND FACILITIES USED FOR THE ASSESSMENT  
OF SUSTAINABLE ACCESS?

We agree with the range of services and facilities used for the assessment of sustainable access. The Rural Settlements and Villages 2015 Topic Paper assessed 51 villages and settlements and identified that out of these 51 locations Yate and Thornbury were awarded the highest points. This also demonstrates that in our view land to the west of Bristol road would be a sustainable location for further development to assist in in meeting the shortfall in 5 year housing land supply.

## QUESTION 10: DO YOU AGREE WITH THE RANKING OF THE RURAL VILLAGES AND SETTLEMENTS?

Yes. As highlighted in the table set out on page 22 Thornbury is considered as 'excellent access' in terms of sustainable access to key services and facilities. Thornbury has been identified as having excellent access with potential development land outside the previous existing settlement boundary and also within the Green Belt.

### QUESTION 11: DO YOU HAVE ANY COMMENTS ON STEP 2?

At paragraph 19.2 we acknowledge that the council have recognised that “*boosting housing numbers in specific settlements to support or enhance access and availability of key services and facilities, may lead to more sustainable outcomes*”. Taking a more strategic view of delivery of housing is not for the Policies Sites and Places Plan given the threshold is currently at 150 dwellings per site. The Step 2 level of strategic planning should be more holistic and seek to allocate much larger tracts of development land that can subsidise the improvement of key infrastructure. Thornbury, whilst it is a strategic settlement, is poorly serviced to the north east by the feeder roads connecting to the A38 and as a consequence is likely to require fundamental and significant infrastructure improvements to facilitate the growth on ‘white’ land.

The PSP should consider simply an approach of delivering sites of 50 to 250 dwellings in an number of sustainable locations and leave the macro scale strategic planning to the West of England Partnership JSP. AS such, a green belt review for medium scale sites that do not perform well against the Green Belt principles in the NPPF will be sufficient to bridge the gap in supply.

## QUESTION 12: DO YOU HAVE ANY OTHER COMMENTS ON THE ASSESSMENT PROCESS SET OUT IN PART 2

We agree with the assessment process set out to identify housing sites which are suitable for allocation within the PSP Plan, however a more detailed review of the sustainability criteria of sites submitted that are within the Green Belt will allow for those sites to come forward where the programme for delivering available sites not in the green belt is constrained by the requirement for upgrading infrastructure prior to the delivery of housing.

QUESTION 13: DO YOU HAVE ANY COMMENTS ON THE  
PROPOSED SEA/SA APPROACH AND PROCESS?

Not at this stage.

## QUESTION 14: DO YOU HAVE ANY OTHER COMMENTS ON THIS CONSULTATION PAPER?

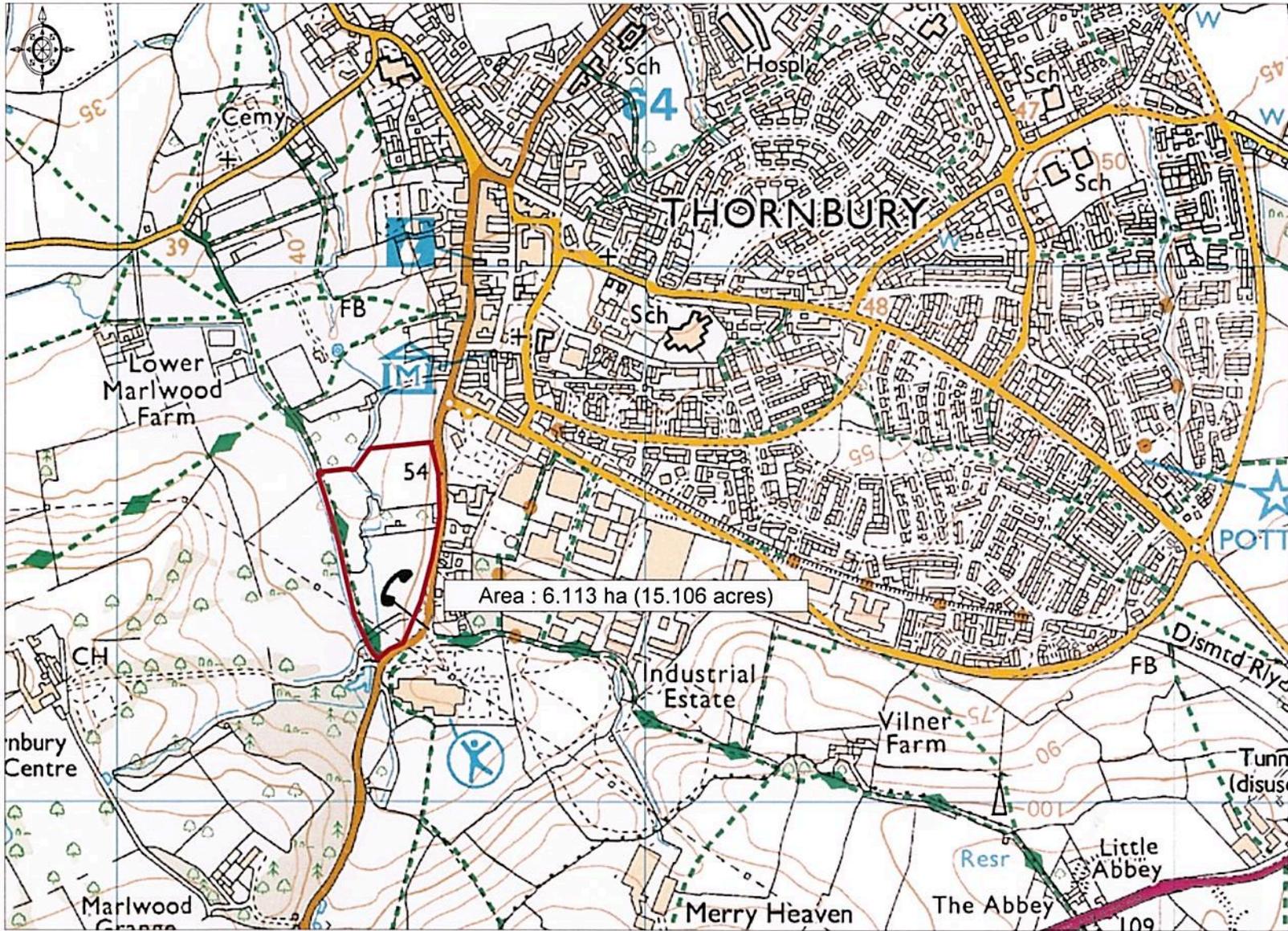
To be 'sound' a plan must be:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

These representations highlight that the Plan should be positively prepared, justified, effective and consistent with National Policy by setting out the requirements and aligning the proposed scope with these requirements.

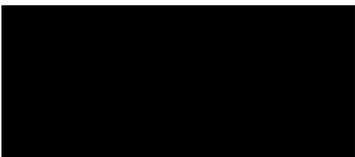


## APPENDIX 1: SITE LOCATION PLAN



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## CONTACT DETAILS



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## Policies, Sites and Places Plan – Call for Sites Response Form

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This form should only be used by landowners and developers that are promoting a site for inclusion in the PSP Plan.

Comments are invited on the issues set out in paragraphs 19.1 – 22.2 of the PSP Plan Regulation 18 Consultation document in respect of the suitability, availability and achievability of potential housing sites. The purpose of these questions is to gauge potential preparedness to engage constructively in a possible planning application process, likelihood of achieving policy compliant schemes and early delivery of dwellings.

Comments related to the general methodology and process should be set out on the response form for the Regulation 18 Consultation document, available online: [www.southglos.gov.uk/PSPconsultation](http://www.southglos.gov.uk/PSPconsultation)

Please note that freedom of Information regulations mean that the Council cannot treat any information supplied confidentially.

For enquiries or assistance please contact the Strategic Planning Policy and Specialist Advice Team 01454 863469 or [planningLDF@southglos.gov.uk](mailto:planningLDF@southglos.gov.uk)

### 1. YOUR DETAILS

**Ref Number (for office use only)**

Name

Tom Stanley

Company/Organisation  
(If relevant)

Colliers International

Address

Colliers International  
Ground Floor  
10 Temple Back  
Bristol

Postcode

BS1 6FL

Telephone

Email address

I am

(please tick all those that apply)

Owner of part of the site

Land agent

Planning consultant

Developer

Affordable Housing Provider

Amenity/Community Group

Local resident

Other

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## 2. SITE DETAILS

Site address

Land on the west side of Bristol Road, Thornbury, South Gloucestershire

Site Postcode

BS35 3JA

Grid ref. (if known)  
e.g. 367712,177756

ST 63507, 89553

Site area (hectares)

6.13 Hectares

Current use(s)

The development land is currently in agricultural use and has been regularly used to host Fun Fairs amongst other things. The site has no redeeming features or characteristics of any significance or importance.

Relevant Planning History  
(if known please include any relevant planning application reference number(s) and confirm if the site has previously been submitted in response to a call for sites for the PSP or other Local Plan process).

According to the online planning history records the site has no planning history.

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## 3. PROPOSED FUTURE USES AND CAPACITY

Please indicate if the proposal is for 100% residential or a mixed use scheme (and if so the intended proportions and respective capacity of each use.)

The site is for 100% residential scheme

Please state how your proposal is proportional to the existing size and character of the settlement. E.g. % increase of existing settlement (Demographic data on existing settlement size is set out in the Rural Villages and Settlements Topic Paper (2015))

The site lends itself well to a residential development. The eastern boundary of the site is adjacent to Bristol Road, which leads the short distance into the town centre. The proposed site is also well connected to Thornbury Leisure Centre and Tesco supermarket, which are both located on the opposite side of Bristol Road, adjacent to the site and accessed by public footpaths.

The site also boasts excellent access out of Thornbury, to the south, which allows further access to the A38 facilitating excellent links to both Gloucester and Bristol principally, as well as Cardiff and London.

Please state how your proposal will address/contribute to the community aspirations established during previous consultation rounds of the PSP Plan and listed at Appendix 2 of the November 2015 PSP Plan consultation document

The proposed allocation could contribute to address the provision of single storey dwellings in new residential developments.

#### 4. SITE OWNERSHIP AND STATUS

I (or my client/organisation)	Is sole owner of the site	[Yes]
	Owns part of the site	[ ]
	Do not own the site	[ ]

If you are not the owner, or only own part of the site, do you know who owns the site or the remainder of it (please provide details, including a plan showing site ownerships)

The landowner is the sole owner of the site.

Does the owner (or other owner(s) support your proposals for the site? [Yes]

Is the land for sale? If so how long has it been on the market?

The Land is not currently being marketed

Are there any covenants or other legal issues that may restrict development potential? If so please explain. (including wayleaves and easements)

There are no covenants or legal issues that may restrict development potential.

Has the land been subject to developer interest e.g. initial interest, a feasibility appraisal, option agreement or contract to purchase? If so please provide details including the nature of the option agreement(s) and purchase contract(s), i.e. fixed / minimum value or subject to planning.

Yes, the land has been subject to developer interest.

Have any utility searches been undertaken?

[No]

If so is the site readily serviceable? Please provide details of which utilities are available to the site.

No utility searches have been undertaken

Have or are consultants engaged to undertake any studies or design work?

[No]

If so who and when? Please provide details. Please indicate if those studies may be made available to the Council?

No studies have been undertaken at this current time.

Please indicate an approximate timescale for delivery (no. of dwellings per year):

<b>2016/2017</b>	<b>2017/2018</b>	<b>2018/2019</b>	<b>2019/2020</b>	<b>2020/2021</b>
30	30	20		

<b>2021/2022</b>	<b>2022/2023</b>	<b>2023+</b>

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## 5. SITE CONSTRAINTS

Has the highway authority been consulted? [No]

If so please provide details, of when and any conclusions.

The highways authority has not been consulted.

Has any proposed scheme been financially appraised? [No]

If so did the appraisal conclude that a development would be viable and provide a reasonable return to the landowner? [ ]

Can any assumptions and or the appraisal work be provided to the Council? [ ]

Have any soil investigations been undertaken? [No]

If so was any significant contamination found or need for further investigations advised? Please provide details.

No soil investigations have been undertaken on site

Is the site subject of a Local Green Space nomination or any other such designation? If so please provide details below.

The site is not subject to Local Green Space nomination

*With regard general site constraints the Council retains significant information and expertise with regard these issues. The Council **does not** advise that such studies should be commissioned at this time if not already done so. Depending on the Council's initial considerations interested parties will be advised where necessary if and when additional study work should be undertaken to support a proposed allocation.*

Would the site impact on any landscape, ecological, archaeological or built heritage interests? Please provide use the box below to provide information of any such interests where known and the details of studies undertaken.

The site is washed over with green belt designation and is likely to require a green belt release or allocation to be bought forward for development.

Is the site known to suffer from any flooding issues (river or drainage related)? Please provide details, and of any studies undertaken, in the box below.

A proportion of the site falls within Flood Zone 3 and as such significantly reduces the Net Developable Area. Taking into account the proportion of the site within Flood Zone 3 and the technical difficulties associated with that, we propose that net developable area of the site to be well below 2.5 ha, accommodating a maximum of 80 dwellings at a density of 35 dwellings per hectare, subject to further constraint analysis, technical solutions and open space provision.

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## **6. ADDITIONAL COMMENTS**

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The information collected as part this consultation will also be used by the Council in accordance with the data protection principles in the Data Protection Act 1998. The purposes for collecting this data are: to assist in plan making; and to contact you, if necessary, regarding the planning consultation process. Some of the data may be made public as it will form part of the evidence base used to inform the creation of planning policy documents. The above purposes may require public disclosure of any data received on the response form, in accordance with the Freedom of Information Act 2000.