

Colchester Local Plan Review - Strategic Land Availability Assessment (SLAA) Methodology Consultation
20th October to 17th November 2023 Consultation Responses Summary

Name	Summary of Representation	Officer Response
CAUSE	<p>I do not object to the methodology but the consultation forced me to choose support or object. I have additions to make. Ideally, a call for sites should not happen until a strategy is in place, and ideally this SLAA should then apply to see if sites comply with the strategy.</p> <p>The appraisals set out in the methodology need to go further, as follows, looking at capacity of the road network adjacent to the site capacity of public transport serving the site frequency of public transport (bus or train)? capacity of schools, doctors' surgeries? number of bike paths adjacent to site</p>	<p>As part of the Local Plan Review process a number of evidence base documents need to be prepared at similar timescales, however many do inform each other.</p> <p>The SLAA assesses a site's suitability, availability and achievability with the aim of objectively determining which sites will be deliverable over the plan period.</p> <p>The overall strategy and site allocations for the Colchester Local Plan Review will be informed by a range of evidence base documents and engagement.</p> <p>The Settlement Boundary Review and Sustainability Appraisal, among other evidence base documents, will consider the capacity of a number of facilities and infrastructure to inform the Local Plan Review. It is considered more appropriate for this to be at the settlement scale, as opposed to individual sites.</p>
Natural England	<p>Natural England does not have available staff resources to provide bespoke advice on SHLAAs or attend meetings in connection with them. In line with the National Planning Policy Framework, we offer the following generic advice on key natural environment considerations for use in producing or</p>	<p>Noted.</p>

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	<p>revising SHLAAs, which we hope is of use.</p> <p>Natural England does not have any specific comments on the draft Methodology.</p>	
<p>Anglian Water Services</p>	<p>3.4 Anglian Water welcomes the inclusion of infrastructure and green infrastructure to the wider range of uses considered in the SLAA. This helps to ensure that the Local Plan is able to plan holistically and ensure that critical infrastructure can be delivered in a timely way to support sustainable growth. We would suggest that this list could also be broadened to include sites for renewable energy.</p> <p>Table 2 – Initial survey constraints: Anglian Water recognise that some high level assessment is required to identify available and deliverable sites. However, the constraints should also consider that different conclusions may arise depending on the intended use of the site. Sites for infrastructure would not necessarily meet the same criteria as for residential development - for example, in terms of our water recycling infrastructure, it is considered less vulnerable in terms of flood risk.</p> <p>3.29 – we agree that the site suitability can be considered in terms of where any constraints can be overcome through reasonable mitigation.</p> <p>3.31 – Anglian Water suggests that the term infrastructure is broad but generally will provide a</p>	<p>Noted.</p> <p>The Planning Practice Guidance (PPG) clarifies that the SLAA process applies to sites for housing and economic development proposals. The Council have included infrastructure to apply a transparent and consistent approach to assessing sites.</p> <p>It is considered more appropriate for the Initial Survey to apply to sites proposed for residential and employment uses only. Any sites proposed for infrastructure will not be considered through the initial survey and will be assessed from Stage 2 of the assessment.</p>

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	wider role in supporting existing communities and future growth.	
W Sunnucks	<p>Officer Summary:</p> <p>1. Size No established pathway for smaller sites of 5 dwellings or less. Can SLAA explain that screening system only excludes small sites for administrative reasons and is not intended to block proposals.</p> <p>2. Transport Networks Methodology puts insufficient weight on transport networks – roads, railways and bus routes. This should be starting point for locating development, not an afterthought. Transport led growth would create development along each of the major routes into Colchester. Benefits for both town centre and countryside.</p>	<p>The SLAA methodology has been updated to outline that sites below the site size thresholds are not precluded from coming forward via the planning application process.</p> <p>The overall strategy for the Colchester Local Plan Review will be informed by a range of evidence base documents and engagement.</p> <p>The Settlement Boundary Review and Sustainability Appraisal, among other evidence base documents, will consider the capacity of a number of facilities and infrastructure to inform the Local Plan Review. It is considered more appropriate for this to be at the settlement scale, as opposed to individual sites.</p>
Historic England	As the Government’s adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process, and therefore welcome the opportunity to comment on these proposals. I can confirm that while we do not have any specific comments to make at this stage, we will be interested in receiving subsequent consultations on this and related projects	Noted.
A Warnes	<p>Officer Summary:</p> <p>1. I am concerned they are considering developing any site that has any part of it in flood zone3.</p>	The Initial Survey criteria in relation to flood zone 3 has been updated.

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	<p>(Page11)</p> <p>2. The same goes for AONB's etc. Page 11)</p> <p>3. We should be considering sites of less than 5 dwellings (Page10)</p> <p>4. Sites in the development / neighbourhood plan are mentioned. Can we ensure that Great Tey neighbourhood plan is considered. (Page12)</p> <p>5. General - I know it is not currently at approval stage but can we push to ensure that our Neighbourhood Plan is at least taken into consideration. It highlights the villages preferred site.</p>	<p>The Initial Survey identifies any sites that have been proposed wholly within the Dedham Vale Area of Outstanding Natural Beauty (AONB) and removes these from further assessment.</p> <p>The SLAA methodology has been updated to outline that sites below the site size thresholds are not precluded from coming forward via the planning application process.</p> <p>The SLAA includes criteria related to sites that are allocated for development in the current adopted Local Plan, including Neighbourhood Plans to identify which allocations have been delivered, are likely to be delivered by 2033 or which require further assessment.</p>
Dandara	<p>General - Staged approach to site assessment logical, where mitigation put forward, pragmatic view must be taken. Most sites will need to be considered for further assessment as not possible to predetermine preferred strategy.</p> <p>Suitability Criteria - Sites should not be ruled out where mitigation can potentially be delivered.</p> <p>Main Access and Highways Constraints – A12 Chelmsford to A120 widening scheme should be taken into account as will increase capacity of local road network. Updated transport modelling required, historic views cannot be relied upon.</p> <p>Walking Distances to Key Services – ability of sites</p>	<p>The SLAA assesses a site's suitability, availability and achievability with the aim of objectively determining which sites will be deliverable over the plan period.</p> <p>The overall strategy and site allocations for the Colchester Local Plan Review will be informed by a range of evidence base documents and engagement.</p> <p>As part of the Local Plan Review process a number of evidence base documents need to be prepared at similar timescales, however many do inform each other.</p>

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	<p>to offer improvements should mean all sites are given fair consideration where delivering locally. Availability Criteria – Approach supported (landownership and promotion).</p>	<p>Transport modelling has been identified as being required for the Local Plan Review. This evidence base document will be prepared at the most appropriate time.</p> <p>It is not considered necessary to separately assess issues which may prevent or limit the developable area. The RAG assessment has been updated and considers whether each issue is likely to affect the sites deliverability.</p> <p>Noted.</p>
<p>Pegasus Group (Bloor Homes Eastern)</p>	<p>Stage 1 Physically isolated for existing settlement – not clear how will apply.</p> <p>Stage 2 Is RAG rating on each criterion subject to any weighting? Impact of receiving red rating under a criterion is not clear How is overall conclusion to site’s overall prospects reached? Object paragraph 3.26 (publication of Call for Sites’ forms)</p> <p>Section 1 Suitability Data sources do not include site specific technical evidence submitted by site promotor. Criterion 1 - update to include “or the built up area of the settlement?” Criterion 5 – Green rating, high and unrealistic</p>	<p>The Initial Survey has been updated to remove reference to existing settlements to align with the NPPF approach to development in the countryside.</p> <p>From Stage 2 of the SLAA assessment, one individual Red RAG assessment does not necessarily rule out the site from further consideration. A section has been included in the methodology report to provide more clarity on the outcome of the site assessments.</p> <p>Reference to publication has been deleted. The Call for Sites forms and Site Assessments will be published in accordance with GDPR at the appropriate time.</p> <p>Where appropriate, data sources have included information from the Call for Sites pro-forma. This</p>

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	<p>measure. Amendment proposed. Criterion 6 – Red rating, no evidence or explanation. Criterion 7 – Object. Remove criteria. Red and Amber rating unclear. Access to key services Criterion 1 – Object.</p> <p>Section 3 Achievability Criterion 3 – Object. Remove criteria.</p>	<p>will, where relevant, include information submitted by the site promoter.</p> <p>Clarification added to criteria on proximity to settlement boundary.</p> <p>Criterion 5: The RAG assessment has been updated and considers whether each issue is likely to affect the site’s deliverability.</p> <p>Criterion 6: This approach is reflective of the NPPF’s preference for utilising previously developed land, over greenfield land.</p> <p>Criterion 7: Data from Natural England is used for this criterion to provide a consistent approach to assessment. The RAG assessment has been updated to consistently assess all land classifications.</p> <p>Access to key services is now measured via four questions (primary school, secondary school, supermarkets/convenience stores and GP surgeries) as opposed to one which captured a number of services. This will also be assessed at the settlement and ward scale through the Settlement Boundary Review.</p> <p>The criteria related to Minerals and Waste has been reviewed and the justification updated to align with the Minerals and Waste Local Plans.</p>

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Gladman	<p>Stage 1 – Initial Survey No amber in RAG rating – potentially limits sustainable sites from progressing to next stage.</p> <p>Stage 2 – Site Assessment Greenfield/Brownfield Land – both are needed to meet housing need. Inappropriate red rating. Remove criteria and include information for context only.</p> <p>Green Infrastructure Enhancement Question ability to answer this question based on Call for Sites proforma and GIS alone. Only addressed through in-depth assessment. Revise source.</p>	<p>The Initial Survey criteria has been updated to be more specific that sites within Flood Zone 3 will be considered unsuitable and not progress to the next stage of assessment.</p> <p>The Initial Survey has been updated to clarify the survey takes into account national policy and designation to determine whether a site is suitable or not for future development.</p> <p>This approach is reflective of the NPPF’s preference for utilising previously developed land, over greenfield land.</p> <p>From Stage 2 of the SLAA assessment, one individual Red RAG assessment does not necessarily rule out the site from further consideration. A section has been included in the methodology report to provide more clarity on the outcome of the site assessments.</p> <p>The Green Infrastructure enhancement criterion has been updated to clarify various sources of data will be used.</p>
Hopkins Homes	<p>Previous SLAA as a data source for sites – predetermined conclusion? Concerned regarding the potential loss of the ‘Amber’ category within the Red-Amber-Green assessment.</p> <p>Red-Amber-Green approach to things like</p>	<p>Wording has been updated to clarify the use of desktop review data sources to prevent predetermination.</p> <p>The Initial Survey has been updated to clarify the survey takes into account national policy and</p>

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	<p>agricultural land classification, utilities and land ownership – without an Amber option, sites could be prematurely discounted from further assessment?</p> <p>Wording suggests that site visits will be undertaken where considered necessary, table confirms these are how evidence will be gathered - lack of consistency?</p> <p>Landscape, archaeology and heritage - What evidence base will be used for these and how will officers make informed judgements that can be consistent and “sound” in their approach/conclusions?</p> <p>Windfall allowance based on evidence of previous delivery.</p>	<p>designation to determine whether a site is suitable or not for future development.</p> <p>Stage 2 of the assessment includes a RAG assessment.</p> <p>All data sources have been reviewed and updated where necessary to clarify what evidence will be used for each criterion.</p> <p>Removal of criteria regarding landscape harm and key views as these are considered too specific and subjective to enable a consistent assessment. These matters will be considered through the Sustainability Appraisal and other evidence base documents as part of the plan making process.</p> <p>Noted.</p>
Boyer (Vistry Homes Ltd)	<p>Table 1 – benefit including sites from previous SLAAs?</p> <p>Para 3.18 – LPA could discount site only part within boundary and part outside.</p> <p>Table 2 - Agree</p> <p>Para 3.21 – Opportunity to review Council’s assessments and seek proposal amendments</p> <p>Para 3.30 – Unclear evidence base Utilities - fails to take into account capacity can be</p>	<p>Wording has been updated to clarify the use of desktop review data sources to prevent predetermination.</p> <p>The Initial Survey has been updated to clarify the survey takes into account national policy and designation to determine whether a site is suitable or not for future development. The Initial Survey does not rule out a site from further assessment if it is only part within a designated landscape.</p> <p>From Stage 2 of the SLAA assessment, one individual Red RAG assessment does not necessarily rule out the site from further</p>

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	<p>provided</p> <p>Prevent/limit developable areas – how identify constraints that are underground and impact may have on developable area.</p> <p>Landscape character – unclear evidence base or specialists and how rating determined.</p> <p>Key Services – include walking, cycling and wheeling</p> <p>Site Ownership – Has site been promoted recently?</p> <p>Existing Policies – not useful metric Reliance on another parcel of land – not unsurmountable</p> <p>Alternative use – how will be undertaken, especially for Neighbourhood Plans.</p> <p>Para 3.32 – evidenced based and reviewed each year</p> <p>Para 3.3 – How will sites be taken forward. Unclear what happens if site has red rating for any criterion.</p>	<p>consideration. A section has been included in the methodology report to provide more clarity on the outcome of the site assessments.</p> <p>It will be considered further how and when the SLAA information will be published in the most user friendly way in accordance with GDPR.</p> <p>The purpose of the SLAA is not to create the spatial strategy. A number of evidence base documents (including the SLAA, Sustainability Appraisal, Settlement Boundary Review, Green Infrastructure Strategy and others) will be used alongside engagement and consultation to develop a spatial strategy and preferred site allocations.</p> <p>There will be the opportunity for further engagement as part of the Local Plan process.</p> <p>All data sources have been reviewed and updated where necessary to clarify what evidence will be used for each criterion.</p> <p>The criterion in relation to utilities does not include an assessment of existing capacity.</p> <p>Removal of criteria regarding landscape harm and key views as these are considered too specific and subjective to enable a consistent assessment. These matters will be considered through the</p>

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		<p>Sustainability Appraisal and other evidence base documents as part of the plan making process.</p> <p>Access to key services is now measured via four questions (primary school, secondary school, supermarkets/convenience stores and GP surgeries) as opposed to one which captured a number of services. This will also be assessed at the settlement and ward scale through the Settlement Boundary Review. All active and sustainable travel modes will be considered throughout the Local Plan. The assessment criteria has been clarified as this will measure distance (proximity) to key services.</p> <p>The site ownership criterion has been updated.</p> <p>In accordance with the PPG, Section 3 of the assessment considers achievability (including viability) as known at the current time. Further viability assessment will be undertaken as part of the planning making process.</p> <p>Neighbourhood Plans are part of the Development Plan and will be reviewed as and when required.</p> <p>Noted.</p>
ADP (Mersea Homes)	Object RAG rating in Tables 2 and 3. RAG only for overall score of site. Examples proposed.	The Initial Survey has been updated to clarify the survey takes into account national policy and designation to determine whether a site is suitable or not for future development.

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	<p>Table 2 –Object Red for any site physically isolates from existing settlement.</p> <p>Table 3 – Object. Should be tailored to green infrastructure needs. 0.25ha threshold too restrictive.</p> <p>Section 1 – Suitability Settlement Boundary, coalescence, utilities, limits to developable area, brownfield/greenfield, neighbouring uses, landscape character, key views, green infrastructure, key services – too restrictive.</p> <p>Local Designations – object inclusion on Coastal Belt.</p> <p>PROW – too simplistic</p> <p>Section 2 – Availability Ownership – wrongly penalises sites with multiple owners. Working in partnership, current uses – too restrictive</p> <p>Section 3 Minerals, alternative use, contamination – too restrictive.</p>	<p>Initial Survey (Stage 1) now only applies to sites proposed for residential and commercial uses. Any sites proposed for infrastructure (including green infrastructure) will be assessed from Stage 2 of the process.</p> <p>From Stage 2 of the SLAA assessment, one individual Red RAG assessment does not necessarily rule out the site from further consideration. A section has been included in the methodology report to provide more clarity on the outcome of the site assessments.</p> <p>The Initial Survey has been updated to remove reference to existing settlements to align with the NPPF approach to development in the countryside.</p> <p>Clarification added to criteria on proximity to settlement boundary.</p> <p>No update considered necessary in relation to coalescence.</p> <p>The utilities criterion is seeking to identify if there are any potential barriers to delivery that could affect deliverability. It does not include an assessment of existing capacity.</p> <p>The RAG assessment has been updated and considers whether each issue (topography, pylons etc) is likely to affect the sites deliverability.</p>

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		<p>This approach is reflective of the NPPF's preference for utilising previously developed land, over greenfield land.</p> <p>The neighbouring uses criterion is seeking to assess the potential for impacts and not the implications.</p> <p>Removal of criteria regarding landscape harm and key views as these are considered too specific and subjective to enable a consistent assessment. These matters will be considered through the Sustainability Appraisal and other evidence base documents as part of the plan making process.</p> <p>The approach to public open space is in accordance with the NPPF.</p> <p>Access to key services is now measured via four questions (primary school, secondary school, supermarkets/convenience stores and GP surgeries) as opposed to one which captured a number of services. This will also be assessed at the settlement and ward scale through the Settlement Boundary Review. All active and sustainable travel modes will be considered throughout the Local Plan. The assessment criteria has been clarified as this will measure distance (proximity) to key services.</p> <p>The site ownership criterion has been updated.</p>

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		<p>The criteria related to Minerals and Waste has been reviewed and the justification updated to align with the Minerals and Waste Local Plans.</p> <p>In accordance with the PPG, Section 2 and 3 of the assessment considers availability and achievability as known at the current time.</p> <p>Where appropriate, data sources have included information from the Call for Sites pro-forma. This will, where relevant, include information submitted by the site promoter.</p>