

Planning Policy Team
Colchester Borough Council
Colchester

15th November 2023

By email: local.plan@colchester.gov.uk

Dear Sir/Madam,

Re: Draft Strategic Land Availability Assessment Methodology

Introduction

This letter is submitted in response to the current consultation held by Colchester Borough Council ('Colchester BC') on the draft Strategic Land Availability Assessment ('SLAA') Methodology. At this stage, Gladman has general comments that will assist in preparing the Methodology; these comments are made to ensure that the document is sound. Gladman requests to be kept up to date on the progress of this document and any future consultation(s) on the SLAA.

Gladman specialises in promoting strategic land for residential development and associated community infrastructure and has considerable experience in contributing to the Development Plan preparation process and supporting documents, having made detailed representations on numerous Local Plan consultations and having participated at Local Plan Examinations across England. It is based on that experience that our comments are made in these representations.

Comments on 'Stage 1 - Identifying the sites'

Gladman notes that in the 'Initial Survey' section (paragraph 3.16 onwards), Tables 2 and 3 set out the proposed constraints and criteria for the initial survey which will omit sites from any further detailed assessment if a red 'RAG' rating is returned.

Gladman would like to flag that the methodology potentially limits sustainable sites from progressing to the next stage of the SLAA process by not incorporating an 'amber' status into the RAG rating. There is a particular issue with excluding sites that are more than 50% in Flood Zone 3. While development should be directed away from flooding from areas of the highest risk (paragraph 159 of the Framework), there could be the capability for sites where more than half of the site area is in flood zone 3 to accommodate development outside of the flood

zone or within lower risk flood zones 1 and 2. Instead, these sites should be given an amber rating (similar to page 22 of the Suitability Assessment), and further flood risk assessment should be undertaken on such sites. Taking this approach would be in line with the purposes of paragraph 159 and ensure that the Council does not overlook sites suitable for sustainable development.

Comments on 'Stage 2: Site Assessment'

Greenfield versus Brownfield Land

Greenfield *and* brownfield housing sites are required to meet the housing needs of local planning authorities: indeed, Colchester BC's Local Plan comprises a mixture of greenfield and brownfield sites. It is, therefore, inappropriate that the Site Assessment table to determine the suitability of sites includes a RAG rating on page 18 that affords sites that are 'approx. 75% plus' greenfield a red score. A preference in the NPPF for utilising previously developed land is exactly that and should not be a determining factor of a positive or negative assessment. The potential issues that impact greenfield and brownfield sites are included as separate criteria within the assessment, making the greenfield/brownfield assessment criterion redundant. Gladman suggests removing the greenfield/brownfield criterion from the assessment; the information should be included in the SLAA for context only.

Green Infrastructure Enhancement

On page 21, the assessment asks, 'Could development of the site enhance or create green infrastructure' ('GI') before listing GI types. Gladman questions the ability to answer this question based on the call for sites proforma and GIS alone. Such a question can only be adequately addressed through in-depth assessment. Gladman suggests that Colchester BC revise the sources that will be used to assess the sites against this criterion.

Conclusion

Gladman welcomes the opportunity to comment on the SLAA and would like to be kept informed as this document progresses. I hope you have found these representations constructive, and should you wish to discuss any of the points raised in detail, please do not hesitate to get in contact.

Yours faithfully,

Oliver Lloyd

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