



T : 01206 242070

E : mail@adpltd.co.uk

W : www.adpltd.co.uk

1 Kolo Walk – Colchester – Essex – CO4 6ER

Planning Services
Colchester City Council

15th November 2023

Dear Planning Services,

Draft Strategic Land Availability Assessment Methodology – Consultation

We write on behalf our client, Mersea Homes, to provide comments on the Draft Strategic Land Availability Assessment Methodology. These comments are follows:

Paragraph 3.20 – We object to the use of the RAG (Red, Amber, Green) rating in Tables 2 and 3.

Whilst the RAG rating can provide a useful visual aide when assessing sites, it is too simplistic to apply for this SLAA exercise.

Each site will require a qualitative assessment to understand its planning merits, and such an assessment cannot be presented through the use of a RAG rating without losing some of the nuances that need to be taken into account.

The RAG rating should therefore only be used to assess the overall score of a site, or to assess the site against national designations.

A more informed and weighted scoring system would provide a more robust assessment of each site. The following extract is taken from Chelmsford’s SHLAA assessment and would appear a more appropriate way of assessing individual sites.

SHELAA Reference: CF55		RAG Rating: Red	30 May 2023
Site Address:	Land South of 1 Oak Cottages, Chalk Street, Rettendon Common, Chelmsford, Essex, CM3 8DD		
Parish:	Rettendon	Total Score:	97
Developable Site Area (ha):	0.01	Reason for discounted areas:	
Potential Yield:	0	Typology:	19
Proposed Use:	Residential	Comments on the size of site:	
Suitability Criteria:		Suitability Rating: Red	
Proximity to Employment Areas	5	Site is outside of any existing/proposed employment allocation	
Impact on Retail Areas	5	Development does not result in the loss of established shops and services within Chelmsford City Centre, South Woodham Ferrers Town Centre or any designated Neighbourhood Centres	
Proximity to the Workplace	5	Site is within 2km walking distance of an employment allocation	
Public Transport	0	Site is in excess of 400m walking distance from all services	
PROW and Cycling Connectivity	0	Site is not connected to either an existing PROW or cycle network	
Vehicle Access	5	A route exists enabling vehicle access into/adjacent to the site	
Strategic Road Access	N/A		
Designated Heritage Assets	5	Site does not contain any designated heritage assets	
Non-Designated Heritage Assets	5	Site does not contain any non-designated heritage assets	
Archaeological Assets	5	Site is not thought to contain any assets of archaeological interest	
Minerals & Waste Constraints	5	Less than 5ha of a site is within a Minerals Safeguarding Area. Site is not within a Minerals or Waste Consultation Area	
Defined Open Space	5	Site does not lie within an area defined as Open Space, an existing/proposed Country Park or 'Other' Green Space	
Green Belt & Green Wedge	0	The majority of the site (90% or more) lies within the Metropolitan Green Belt or Green Wedge	
Land Classification	0	Site is predominantly Greenfield and primarily within the land classification/s: Grade 1, Grade 2 or Grade 3	
Protected Natural Features	3	Site does not comprise of any protected natural features but is within 100m of a locally designated protected natural feature or within 500m of an international/national designated protected natural feature	
Flood Risk Constraints	5	Site is wholly within Flood Zone 1	
Air Quality Management Areas	5	Site is in excess of 500m from a designated AQMA	
Ground Condition Constraints	5	Ground treatment is not expected to be required	
Neighbouring Constraints	5	Site has no neighbouring constraints	
Proximity to Key Services	0	Site is in excess of 2km walking distance of one or more services and the City Centre/South Woodham Ferrers Town Centre	
Community Facilities	5	Development would not result in the loss of nor put additional strain on an existing/proposed school/healthcare facility/place of worship/sports, leisure, or recreation facility	
Comments on Suitability	Outside of DSB. Access is via a driveway off of Chalk Street.		
Availability Criteria:		Availability Rating: Green	
Land Ownership	5	Held by developer/willing owner/public sector	
Land Condition	4	Established single use	
Legal Constraints	5	Site does not face any known legal issues	
Planning Permission or Allocation	N/A		
Comments on Availability	Site currently in use for other purpose.		
Achievability Criteria:		Achievability Rating: Green	
Viability	5	Development is likely viable	
Timescale for Deliverability	5	Up to 5 years	
Comments on Achievability			

An alternative approach could be to present each criterion within a single radar graph per site, see image below.

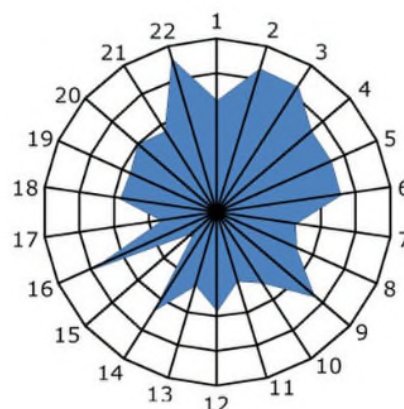


Table 2 - We object to the Red rating for any site that is deemed to be physically isolated from an existing settlement(s) or located in the open countryside. This is too restrictive and should be

Amber. There will be instances where sites are in established built-up clusters but are away from existing settlement boundaries, yet they may still provide potential housing, commercial or infrastructure options needed to serve a community.

Table 3 – We object to the questions cited in Table 3. This table relates to Green Infrastructure, but the questions repeat those in Table 2, which relate to residential and commercial sites. This table should be tailored to the green infrastructure needs.

The 0.25ha threshold is also too restrictive for green infrastructure, as smaller sites could also make a valuable contribution to tree coverage, biodiversity etc.

Section 1: Suitability - As previously mentioned, we have concerns over the use of the RAG rating to assess sites. It should only be used and applied to essential criteria e.g. flood risk and national land designations to sieve out any sites.

The remaining criteria should be considered using an informed and weighted scoring system, supported by a qualitative assessment.

Section 1: Suitability - Assessment Criterion

The SLAA criteria will be discussed below. The objections made are in relation to the RAG rating. The criteria below should only be used if it forms part of an informed qualitative discussion and not a RAG rating.

Is the site within or adjacent to the existing settlement boundary? This criterion is too restrictive as it fails to take account of existing communities and clusters of development that are currently away from existing settlement boundaries, but yet they may still perform an important community and economic function.

Would development of the site lead to coalescence between settlements? This criterion is too restrictive as it fails to understand the nuances of what is being proposed or the contextual circumstances of a site. For example, a site may sit within two settlements, but be proposing significant green infrastructure to maintain a gap between these settlements. This criterion would not take account of that scenario.

Is there any evidence that it would not be possible to deliver the necessary utilities? This criterion is too restrictive, as matters relating to utilities are best addressed at the planning application stage. Any utility deficiencies can be addressed through an Infrastructure Delivery Plan and future local plan policy.

Are there any issues that would prevent/limit the developable area of the site? e.g. topography/levels, pylons. This criterion is too restrictive as matters relating to the developable area should be addressed at the planning application stage, when the detailed technical evidence has been gathered for that process.

Is the site brownfield or greenfield? This criterion is too restrictive as most sites in the Colchester administrative area will be red. This criterion should instead be a statement of fact, rather than a red assessment.

Impact of neighbouring uses (e.g. noise, smell, amenity) – would development be likely to be negatively impacted by, or cause negative impact on, neighbouring areas? This criterion is too

restrictive, as it would result in a subjective assessment that lacks the technical evidence required to make an informed decision. The technical evidence required to understand this matter is at the level required for a planning application submission.

Is the site located within any of the following local designations? • Local Wildlife Site (LoWS) • Local Nature Reserve (LNR) • Coastal Protection Belt. We object to the inclusion of the Coastal Belt, as this designation covers much of the Colchester administrative area and could negatively affect the assessment of the sites that are required to meet the needs of the coastal communities.

Would development harm landscape character or setting? This criterion is too restrictive, as it would result in a subjective assessment that lacks the technical evidence required to make an informed decision. The technical evidence required to understand the landscape impact is at the level required for a planning application submission. Instead, landscape impact should be judged against national landscape designations e.g. the AONB.

Are there any key views from the site? This criterion is too restrictive, as it would result in a subjective assessment that lacks the technical evidence required to make an informed decision. A Landscape Visual Impact Assessment would be required for each site to make an informed assessment. This is onerous and best undertaken at the planning application site.

Could development of the site enhance or create green infrastructure e.g Open Space, Park, Sport and/or recreation grounds, Country Park, Allotments, Biodiversity Net Gain? Given that the SLAA will be considering sites of varying size and context, this criterion is too restrictive. For example, previously developed sites could be penalised because they lack opportunities to increase biodiversity or green infrastructure. If the RAG rating is retained, sites should only be considered against the amber and green ratings. Red should be removed from the assessment.

Would development of the site result in the loss of, or partial loss of, public open space, a Public Right of Way (PRoW), or a bridleway? This criterion is too simplistic and fails to understand the full benefits that an individual site could deliver. For example, a site may result in a loss of public open space, but deliver other public benefits.

Walking distance to key services including primary and secondary schools, supermarkets / convenience stores, GP surgeries and/or Colchester City Centre. This criterion is too restrictive as it would penalise all the sites located outside of the Colchester Urban Area. Development will be required in the villages outside of Colchester that may not benefit from walking accessibility to these services.

Section 2: Availability

What is the site ownership situation? This criterion wrongly penalises sites with multiple owners. Many sites have multiple owners, and need not necessarily be a constraint. Therefore, multiple ownership should not be a red rating. This criterion should be noted as a statement of fact only.

Is the landowner open to working in partnership and bringing the site forward in combination with others to enable a comprehensive approach to development? This criterion is too restrictive. Each site is different and will require a different response. This criterion should be noted as a statement of fact only.

Is the site currently in use and is it likely to continue to be used for the foreseeable future / would that use prevent development on the site from coming forward? This criterion is too restrictive.

Housing land supply is required over a 15 year period and as such, the conditions of the site at this stage of the process will not necessary be the same in a few years from now. Each site is different and will require a different response. This criterion should be noted as a statement of fact only.

Section 3: Achievability (including viability)

Is the site within a Minerals Safeguarding Area and/or Minerals and Waste Consultation Area?

This criterion is too restrictive. It is incorrect to assume that a site being such an area could not come forward. This assessment should be considered in consultation with ECC and following a bespoke minerals assessment. Such an assessment would be more suitable at the planning application stage.

Is the land currently protected for an alternative use within the Colchester Local Plan or a Neighbourhood Plan?

This criterion is too restrictive. Not all existing allocations are now suitable and may not now need to be taken forward in a future local plan. Instead, this criterion should highlight possible recommendations to explore if an allocation may need to be reconsidered.

Is the site contaminated or partially contaminated? This criterion is too restrictive. Contamination assessments are required at the planning application stage. It would not be possible to evaluate contamination as part of the SLAA without having such an assessment carried out for each site, which in itself would be too onerous.

Stage 3 – Windfall Assessment

It is noted that paragraph 3.32 states that the evidence underpinning windfall allowance will be reviewed through the SLAA process. This is supported, however, by increasing the threshold allowance of the SLAA to include all possible sites, this will provide stronger evidence in which to make this windfall assessment.

Moving Forward

We would be happy to discuss the SLAA methodology in more detail with the Council if that would be of assistance.

Yours faithfully,



Andrew Ransome MRTPI

Planning Director