



Historic England

Sir/Madam Planning Policy Team  
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Our ref: PL00793372

27 July 2023

Dear Sir/Madam Team

### **Re: Colchester City Centre Masterplan, March 2023**

Thank you for consulting Historic England on the draft Colchester City Masterplan SPD Consultation. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully considered at all stages and levels of the local planning process. Therefore, we welcome the opportunity to comment on the consultation document at this stage.

Overall, Historic England welcomes the ambition of the Colchester Town Centre Masterplan to create an accessible and linked historic city which values and enhances its heritage assets; acknowledges the need for new public mixed use space; expresses a desire for retrofitting and adaptive use for existing buildings; seeks the reduction of harmful motorised traffic within the core city centre area, and sets out plans for improved, sustainable transport links to encourage greater use of public transport, cycling and walking. We consider that, taken together, the proposals will, in general, contribute to changes over time that will enhance the ability for people to appreciate Colchester's unique and particularly significant heritage, and improve and enhance the setting of historic buildings and monuments within the city centre.

### **GENERAL COMMENTS**

- **Lack of evidence underpinning the Masterplan Design Frameworks**

The Planning and Design Frameworks in the Masterplan for the key development sites must be informed by, and respond to, the historic environment (i.e. informed

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by a Heritage Impact Assessment for each site). The Masterplan Design Frameworks contain highly specific and detailed information, particularly regarding scale and massing, which is too prescriptive. Instead, this detailed information should be agreed upon later and presented in individual Development Briefs for each site. These Development Briefs must be informed by detailed Heritage Impact Assessments (HIAs) and updated Conservation Area Appraisals and Management Guidelines. Therefore, references to proposed massing, building heights, and potential taller structures in the current document (e.g. on p.51 and in the Design Frameworks for each site) should be removed, and their inclusion should be deferred to the subsequent Development Briefs informed by proper heritage assessments.

- **Document should define ‘heritage’**

The document might usefully define what heritage actually means and/or is considered to be - it includes designated heritage assets as well as non designated heritage assets (there is for example a good Local List for Colchester), buildings and structures, public realm, above and below ground assets, individual assets, groups of assets / streets and as a whole.

- **Improvements/enhances to heritage assets should be considered**

The document refers to the enhancement of the setting of heritage assets and to the improvement of access to heritage assets. It must include improvement/enhancement (and where necessary repair and presentation) of the heritage assets themselves.

- **Heritage at Risk**

The Masterplan should mention Heritage at Risk in Colchester (there are currently three churches on the HAR Register), and one of the strands should be to work to remove these assets as soon as possible.

- **Layers should work together harmoniously**

It is important to stress that the layers are (or need to be) interlinked, and not competing.

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## **SPECIFIC COMMENTS**

Having reviewed the consultation material, Historic England has the following specific comments to make, which we will break down by Section.

### **VISION (PAGE 6)**

We are pleased to see the importance given to heritage as a source of community pride and a positive asset for the local economy.

### **01. SETTING THE SCENE**

#### **MASTERPLAN SCOPE AND CITY CENTRE TRANSPORT PLAN (PAGES 12 - 13).**

- **Masterplan boundary should be extended**

We note that the current boundary of the Masterplan appears arbitrary and relates only to the primary and secondary shopping area as defined in the Local Plan, as well as the main city centre development allocations and gateways. We consider this is only part of the city centre, the area should be extended to include the area that is defined by the historic settlement core that includes the entirety of the walled Roman and medieval town, as well as key arteries into (and out of) the historic centre. This includes, for example, East Hill and East Street. We consider the current boundary is disappointing as Heritage is one of the key five layers of the City Centre Masterplan, and because it is stated that the intention is to allow Colchester's heritage assets to be experienced as 'more than a sum of their parts'.

Given the Masterplan's emphasis on heritage, then the plan should extend to cover the historic settlement core and align with the that of the Town Centre Conservation Area, which includes the entire walled Roman and medieval town, as well as key arteries into and out of the historic centre, such as East Hill and East Street. This alignment would help preserve and protect Colchester's heritage assets and ensure that the planning efforts are in line with the city's heritage value.

#### **STRATEGIC CONTEXT (PAGES 14 - 16)**

- **Rationale for sites included in Masterplan unclear**

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Clarity is required regarding the rationale behind selecting specific sites to be included in the Masterplan. While some Local Plan allocation sites are included, some are not. For example, we note that Priory Walk and part of St Runwalds Car Park are site allocations in the Local Plan that are not present in the Masterplan. Therefore, it is important to explain why certain sites were chosen while others were omitted. We further suggest incorporating the projects funded by the Town Deal in the graphics and overall vision of the Masterplan.

## **BASELINE APPRAISAL SUMMARY**

### **WIDER CONTEXT AND USES (PAGE 18)**

- **New allocation sites provide an opportunity to link Castle Park and Abbey Field via St John's Abbey site and St Botolph's.**

We note and agree with the importance given to the system of green spaces within and around the city, many of which are associated with historic structures. The potential to further connect these spaces with green corridors should be explored. In that regard, we note the opportunity the new allocation sites present in order to connect Castle Park and Abbey Field through St John's Abbey site and St Botolph's. We recommend this is considered.

### **HERITAGE (PAGE 20)**

- **Key findings should be expanded to better represent the importance of city's heritage**

We largely agree with the key findings in this subsection, but consider these should be expanded to better represent the importance of heritage within the city, starting from its important underlying archaeology within the city centre - as well as the Roman Circus, Colchester Castle, the Jumbo Tower and many other important assets and historic landmarks within the city. We would suggest that the second paragraph on heritage should be extended to include the Garrison area, given its significance. In relation to the list of Conservation Areas, no. 3 should be revised to refer to the Garrison Conservation Area.

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## **02. VISION AND MASTERPLAN (PAGE 33)**

### **DEVELOPING THE MASTERPLAN**

- **Rephrase ‘protecting and integrating with heritage buildings’**

We welcome the five proposed themes, which align with the Better Colchester Strategic Plan 2020-2023. In relation to heritage, we would recommend that the second strategy: protecting and integrating with heritage buildings, is rephrased to improve clarity: Protecting and celebrating the city’s heritage.

### **ACTIVELY RESPONDING TO THE CLIMATE EMERGENCY (PAGE 34).**

### **ENVIRONMENT AND SUSTAINABILITY - URBAN DESIGN STRATEGY (PAGE 38)**

- **Consider historic fabric and character when making additional built fabric interventions.**

The aims behind the interventions proposed in this section are very positive, helping improve accessibility and sustainability. In relation to this layer’s second strategy, Environment and Sustainability, we note in Section 6. Additional built fabric interventions, the desirability to consider net zero refurbishment in older buildings and revision of opportunities for roof space solar panels or green roofs. This should be subject to an appropriate appraisal considering the sensitivities of historic fabric and character.

### **PROVIDE A SAFE, HEALTHY, ACTIVE AND ACCESSIBLE CITY CENTRE (PAGE 40)**

### **PERMEABILITY AND CONNECTIVITY (PAGE 42)**

- **Pedestrian connectivity with Roman Circus should encompass wider area via St John’s Green and St John’s Abbey Gatehouse.**
- **Improvements to Roman Circus as a heritage destination, not just connectivity.**

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The proposal to improve pedestrian connectivity with the Roman Circus is welcome but should not be limited to Flagstaff Road but consider the wider area encompassing St John's Green, via St John's Abbey Gatehouse. It should also include improvements to the Roman Circus as a heritage destination (and not simply improvements to connectivity). The importance of the Roman Circus Visitor Centre should also be highlighted in the document at some stage.

- **Disappointed with retention of existing lift and stairs to Eld Lane in Vineyard Gate redevelopment, recommend a more appropriate link to enhance the Scheduled Monument's setting.**

Regarding the redevelopment of Vineyard Gate, it is disappointing that the existing lift and stairs to Eld Lane is to be retained. We have previously recommended that it would be a public benefit to replace these, and to provide more appropriate link. This would be an enhancement to the setting of a Scheduled Monument, which is the aim of the Heritage layer / strand of the Masterplan. We would recommend, therefore, this is reconsidered.

- **Suggest reviewing and relocating proposed blue badge parking away from the Town Wall to preserve its setting.**

We also note that blue badge parking is proposed adjacent to the Wall, to the west of the access to the servicing yards. We do not consider this to be an enhancement to the setting of the Town Wall. We recommend this is reviewed and relocated in the scheme away from this Monument.

## **PUBLIC REALM, OPEN SPACE AND LANDSCAPE URBAN DESIGN STRATEGY (PAGE 44)**

- **Proposals affecting Scheduled Monuments, or their settings will require a heritage impact assessment**

We broadly welcome the principles set out in this strategy and consider that, taken as whole, they have the potential to enhance the historic environment of the city centre and its accessibility. We note in the context of creating new areas of public realm - e.g. the Roman wall park - that proposals that would affect areas designated as Scheduled Monuments or in their setting will need to be informed by a proportionate Heritage

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Impact Assessment. We would be happy to advise on this in due course, and in general are supportive of making this highly significant part of Colchester's historic environment more accessible.

- **Enhancing accessibility should consider conserving or enhancing heritage assets**

We welcome the proposal to prepare a Public Realm Design Code for Colchester City Centre, and would welcome the opportunity to input into this process in due course. In the first instance we would highlight our Streets for All Advice Note, covering works to highways and public realm, which contains a set of principles and best practice examples for this work in historically sensitive areas. This includes modifications to historic public realm for accessibility purposes, as is suggested in no.6, and we highlight that changes to enhance accessibility need to have regard to the statutory requirement to conserve or enhance heritage assets at the same time as making reasonable adjustments required by the Equality Act.

#### **LAND USE STRATEGY URBAN DESIGN STRATEGY (PAGE 48)**

- **Support maximising vitality and diversification through mixed uses and residential accommodation which can strengthen the character of historic town centres through sustainable street layouts and reuse of historic buildings**

We welcome the support for maximising the vitality of the city centre through promoting a broader mix of uses and allowing the city centre to diversify away from its focus on retail. In particular, we support ensuring upper floors are either in regular commercial or residential use. Intensifying residential uses in historic city centres by using upper floors generates tripartite benefits for the local authority, building owners, and the local economy by ensuring vacant floorspace is brought into economic use. Increasing residential accommodation would create consequential benefits for local service providers via increased local demand, while also generating greater returns per sq. ft for property owners. We consider that it is usually possible to accommodate growth in residential accommodation in this way without unduly affecting the historic environment, and indeed this approach often reinforces the character of historic town centres through the retention of dense, walkable and sustainable street layouts and use/reuse of historic buildings.

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## **BUILDING HEIGHTS, DENSITY AND BUILT FORM URBAN DESIGN STRATEGY (PAGE 50)**

- **Lack of evidence informing building heights, density and built form**

We disagree with the principle of consolidating taller scale around High Street/Head Street and within lower topographical areas which allow for screening. The latter would go against the traditional pattern of development, while the former could be disruptive to the setting of designated and non-designated heritage assets as well as on the character of the conservation area. Relatedly, we consider that the maximum indicative heights shown in figure presented in p.51 premature. We would have serious concerns about establishing a 'by default' maximum height in the different areas, which should be informed instead by an appropriate appraisal.

Given the sensitivity of Colchester's historic townscape, we are concerned that the strategy in this section of the report indicates support for a new 'landmark building' in the near vicinity of the Roman wall and a number of other highly significant heritage assets. It is not clear what evidence is used to determine what heights may be desirable in this location, nor indeed that a 'landmark' building is desirable. Any such proposal would need to be justified via a thorough analysis of the existing townscape context, including the interrelationship and combined setting of the city centre's heritage assets. We would suggest that unless this analysis has been carried out, the support for a 'landmark' building should be removed from the final masterplan document.

Indeed, more generally, appropriate heights, density, and built form need to be informed by the detailed understanding of the historic environment, the historic grain in terms of scale and massing of the City, as well as in terms of design and materials - which is not presented in this high-level / strategic document. These need to be informed by HIAs (Heritage Impact Assessments) for each proposed development site, as they come forward, and by updated Conservation Area Appraisals and Management Guidelines.

## **MAKE THE MOST OF COLCHESTER'S RICH HERITAGE (PAGE 56)**

We are supportive of the two strategies but consider more could be done to protect and celebrate the city's important heritage. For example, actively look for opportunities to

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help remove historic assets from the Heritage at Risk Register, improve accessibility and understanding, which leads to pride of place.

## **PROTECTING AND INTEGRATING HERITAGE ASSETS (PAGE 60)**

- **Improving visibility, accessibility, and future expansion Roman Circus visitor centre**

With regards to the Roman Circus, the Visitor Centre plays a central role in aiding our understanding of this important scheduled site. We recommend that consideration is given to improve visibility, accessibility and future expansion of the building are included in long term vision and management plans.

- **Ensure adequate resources for wall repair and maintenance, and Town Wall Management Plan actions**

There is mention of a Roman Wall Park which is welcomed. It should include the adequate provision of resources for ongoing repair and maintenance of the Wall, and delivery of the actions identified in the adopted Town Wall Management Plan.

- **Relevant Conservation Management Plans should be referred to in text and additional Plans prepared for other heritage assets**

Related to this we would recommend the document refers to the delivery of the adopted Town Wall Management Plan as well as the adopted Roman Circus Management Plan. Conservation Management Plans should be prepared for other important heritage assets, including St Botolph's Priory and Colchester Castle and Castle Park. Resources need to be secured for the delivery of these plans, and the plans can help focus funding (and lever-in funding) for appropriate/agreed objectives.

- **Below-ground archaeology should be referred to in text**

Finally, we would recommend the document needs to discuss below-ground archaeology, which is a significant omission. This is an important opportunity to make more of Colchester's important below-ground archaeology. Any new development proposals should be informed by Heritage Impact Assessments of below-ground archaeology. Opportunities should be sought to minimise the impact and, thus harm, to

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archaeological remains by new development - and to preserve (wherever possible, in situ), present and promote understanding of the significance below-ground archaeology. This is because, as a long-lived historic settlement, Colchester has a deep and long sequence of well-preserved archaeological remains. The surviving archaeological remains within the city centre (defined by the walled town and environs) are highly significant non-designated heritage assets with equivalent significance to that of the adjacent Scheduled sites.

## CONCLUSION

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

If you have any queries about any of the matters raised or consider that a meeting would be helpful, please do not hesitate to contact me.

Yours sincerely,

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