



# STANFORDS

ESTABLISHED 1879

## Colchester City Council Preferred Options Local Plan Regulation 18 Consultation 2025

Draft Planning Policy Comments For and on Behalf of Stanfords Colchester LLP

**Section: 11**

**Policy PC6: Design and Amenity**

The opening paragraph requires all development to be designed to a “high standard”, to “positively respond to its context”, to “reflect the local distinctiveness of Colchester”, to “contribute to placemaking” and to support a “low-carbon, inclusive and climate resilient future”. Great weight will be given to “outstanding or innovative designs” and “poor design will be refused”.

Most of the subsequent bullets then require development to:

- “Promote visually attractive, functional, coherent and distinctive environments”;
- Provide “attractive, well connected and legible streets and public spaces”;
- Create a “safe, resilient and secure environment” that supports “pride of place”; and
- Deliver “functional, robust and adaptable designs” that contribute to “the long-term quality of the area”.

These phrases are highly value-laden and inherently subjective. The policy does not explain:

- How “attractive”, “distinctive”, “coherent” or “high standard” will be assessed in practice;
- What objective benchmarks, beyond existing Building Regulations, NDSS and adopted design guidance, the Council intends to use; or
- How decision-makers, applicants and Inspectors will distinguish between schemes that are merely “good” and those that qualify as “outstanding or innovative” for the purpose of “great weight”.

Without clear criteria or cross-reference to a defined design code or SPD, there is a real risk that PC6 will simply re-state broad design aspirations already contained in

the NPPF (e.g. section 12) and in adopted Section 2 policies, but in looser language, creating scope for inconsistent and potentially arbitrary application. This undermines the effectiveness of the policy and makes it difficult to see how the Council could robustly substantiate a refusal solely on the basis that a proposal is not “visually attractive” or “distinctive enough”, particularly on allocated sites where the principle and broad parameters are already established.

In addition, PC6 seeks to operate at multiple levels simultaneously:

- As a strategic design vision (placemaking, low-carbon, pride of place);
- As a detailed development management policy (privacy, daylight, NDSS, security); and
- As a process policy (promoting design codes, masterplans, design briefs).

This creates substantial overlap with other policies (ST8, LC1, GN1, EN2, EN8, PC7, PC8) and risks turning PC6 into a catch-all “beauty” test that can be deployed to either support or resist almost any proposal, without clear evidential thresholds.

The policy does not acknowledge the importance of designing for neurodiversity, which is a critical aspect of creating truly inclusive environments. Inclusive design should extend beyond physical accessibility to address cognitive and sensory diversity, ensuring spaces are welcoming and functional for individuals with conditions such as autism, ADHD, and other neurological differences. This involves considering factors like sensory sensitivities (e.g., lighting, acoustics), clear and intuitive wayfinding, quiet zones, and adaptable spaces that reduce stress and promote comfort. By omitting these considerations, the policy risks overlooking a significant portion of the population and failing to meet modern best practice standards for equality and inclusion in the built environment.