



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 PC7: Residential Schemes on Greenfield Sites**

We agree that major greenfield schemes should be landscape-led and well designed. However, as drafted, PC7 reads less like a strategic policy and more like a mini design code, with a long, prescriptive checklist that is not properly calibrated to:

- Different site sizes and roles;
- Landscape and coalescence sensitivities;
- The different character areas of each settlement; or
- The need for proportionate requirements on modest sites.

Taken together with PC6, ST8, EN2, GN1, GN4 and PP44, PC7 risks becoming another layer of detailed design control that duplicates existing guidance (including the Essex Design Guide) and creates scope for inconsistent, subjective decision-making.

**Over-prescription and conflict with local context**

As drafted, the policy reads as a one-size-fits-all checklist rather than a flexible framework that can respond to the very different contexts of major greenfield sites. By way of example, the blanket requirement that primary open space be “located centrally within the site” may not always be appropriate where:

- The key planning issue is coalescence and settlement edge treatment where open space at the outer edge may be preferable to maintain separation;
- The site will be providing new open space areas for the existing residents and so the open space would benefit more people by being located between the new and existing dwellings; or
- The site is modest in scale and already well connected to existing village parks and recreation land.

PC7 does not acknowledge that, on some greenfield allocations, edge-located or linear open space may better meet both landscape and health objectives than a forced “central” feature.

### Duplication

Many of the PC7 criteria are already covered, by:

- PC6 (design and amenity);
- ST8 (place-shaping principles);
- GN1 (green/blue infrastructure); and
- The Essex Design Guide and parking standards.

The effect of PC7 is to restate these themes in highly detailed, mandatory language, effectively creating a “design by checklist” approach. PC7 reads as over-engineered and creates unnecessary friction between other policies and design guides.

### Neurodiversity and inclusive design opportunity

PC7 also misses an opportunity to address inclusive design for neurodivergent residents in a constructive way. Given that green infrastructure and nature immersion has been proven to have significant benefits to the neuro-divergent population, major developments that seek to erode greenfield could play a part in ensuring their design is neuroinclusive. The policy is currently focused on visual composition (character areas, nodal buildings, brick walls, materials), but does not acknowledge:

- The importance of clear, legible layouts and wayfinding for people with autism, ADHD and other neurodevelopmental conditions;
- The value of providing a variety of spaces, including quieter, less visually and acoustically busy pockets of open space, rather than only highly activated, overlooked central spaces; and
- The need to consider sensory impacts of street design, traffic, lighting and proximity to noisy routes when deciding where to place the most active areas versus calmer residential streets.

As drafted, some of the PC7 “musts” could in fact work against neuro-inclusive environments by reducing opportunities for quieter corners, predictable routes and softer edges.

### Requested modifications to PC7

To make PC7 justified, proportionate and effective, and to align it with both the local evidence base and modern inclusive design principles, we request that the Council:

#### Calibrate the policy to site size and sensitivity

Replace blanket “must” language with wording that acknowledges site scale, context and constraints and make clear that smaller allocations will not be expected to provide the same level of internal character area complexity and variety as larger sites.

#### Relax the central open space requirement

Amend the requirement for “primary public open space [to] be located centrally” to recognise that, on some allocations, open space at the edges or in linear form may better deliver coalescence, landscape and amenity outcomes.

#### Avoid design-code level detail in the Local Plan policy

Strip out or simplify the most detailed elements (brick wall requirement, detailed parking treatment prescriptions, exact handling of meter boxes etc.) and instead cross-refer to the Essex Design Guide, any future site-specific design codes or SPDs; and perhaps reconsider if this policy is actually needed or if it is at risk of merely duplicating.

#### Explicitly reference Neuroinclusive design

If this policy remains, it could seek to be used to include Neuroinclusive design by adding a criterion acknowledging that layouts should support inclusive design, including for neurodivergent residents. Make clear in the supporting text that inclusive design is about how spaces are arranged and experienced, not about additional stand-alone assessments.