



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: 4

**Policy EN6: Conserving and Enhancing the Historic
Environment**

1. Proportionality and Practicality

The requirement for all proposals within Conservation Areas to engage with local communities is disproportionate, particularly for householder applications. The National Planning Policy Framework (NPPF, Paragraph 40) encourages early engagement for significant proposals but does not mandate it for minor works. Imposing this requirement universally creates unnecessary delays and costs for applicants and goes beyond national policy, which advocates a proportionate approach.

Recommendation: Limit mandatory engagement to major or complex proposals with significant heritage impact, aligning with NPPF guidance on proportionality.

2. Lack of Heritage Expertise in Community Consultation

Historic England's guidance on Statements of Heritage Significance emphasises that significance should be assessed by qualified professionals, not through informal consultation. Community members can lack technical heritage knowledge, which can lead to unproductive or misinformed feedback and increased administrative burden without tangible benefits.

Recommendation: Community engagement should focus on design quality and amenity issues, while heritage significance remains the responsibility of professionals using evidence-based assessments.

3. Risk of Overcomplication and Delay

Mandating engagement for all proposals could slow down decision-making and increase costs for applicants. This approach is inconsistent with NPPF Paragraph

195, which requires local planning authorities to weigh harm against public benefits not to require universal consultation.

Recommendation: Introduce a tiered approach, mandatory engagement for major schemes or those involving demolition or substantial alteration, and optional engagement for minor works.

4. Alignment with National Policy and Best Practice

The NPPF (Section 16) and Historic England advocate understanding significance through proportionate assessment and balancing heritage protection with sustainable development. Policy EN6 should reflect these principles by supporting heritage-led regeneration, avoiding unnecessary procedural burdens, and promoting collaboration without making it a blanket requirement.

Summary of Recommendations

- Apply the engagement requirement only to major or complex proposals, not routine householder applications.
- Ensure heritage significance is assessed by qualified professionals, not solely through community input.
- Adopt a tiered engagement approach to avoid unnecessary delays and costs.
- Align with NPPF and Historic England guidance by emphasising proportionality and evidence-based decision-making.