



Colchester Preferred Options Local Plan - Regulation 18 Representation

Policy PC6: Design and Amenity

Policy PC6 is supported in principle, particularly the opening section which sets out a clear, balanced and positive expectation for high quality design, placemaking and amenity. This introductory paragraph broadly reflects national policy and is sufficient, in itself, to guide decision-making.

However, we object to the policy as drafted due to its excessive length, duplication with other Local Plan policies, and inclusion of detailed development management matters more appropriately addressed through guidance or Building Regulations.

1. Excessive Prescription and Duplication

The extensive list of criteria (a–r) duplicates requirements already addressed elsewhere in the Plan, including policies relating to:

- Active and sustainable travel;
- Green infrastructure and open space;
- Flood risk and SuDS;
- Biodiversity, trees and climate change;
- Amenity, internal space standards and refuse storage.

This results in policy overlap, repetition and an unnecessary layering of requirements, increasing complexity and uncertainty for applicants and decision-makers. A single, streamlined design policy supported by topic-specific policies and guidance would be more effective.

2. Matters Better Addressed Through Guidance or Regulations

Several criteria relate to detailed technical or regulatory matters that are not appropriate for primary policy, including:

- Refuse and recycling infrastructure design;
- Daylight, privacy and orientation standards applied uniformly regardless of context;
- Sprinkler provision, which is already governed by Building Regulations.

Re-stating Building Regulations within policy adds no planning value and risks confusion should national standards change.

3. Lack of Flexibility and Proportionality

The policy applies a uniform and prescriptive approach to all development types and scales. This risks undermining good design outcomes by **restricting contextual and site-specific responses**. For

example, the absolute requirement for Nationally Described Space Standards would benefit from greater flexibility, allowing schemes to *have regard to* the standards rather than mandating full compliance in all circumstances.

4. Suggested Direction of Change

To improve soundness and effectiveness, Policy PC6 should:

- Retain the opening high-level design principles;
- Remove or significantly reduce the detailed criteria list;
- Avoid duplication with other policies and Building Regulations;
- Rely on design codes, supplementary planning documents and national guidance for detailed implementation.