



Colchester Preferred Options Local Plan - Regulation 18 Representation

Policy PC7: Residential Schemes on Greenfield Sites

Policy PC7 is objected to as drafted because it is overly prescriptive, duplicative of other policies, and risks undermining good design, innovation and deliverability. It tries to apply policies for schemes of 10 or more and says its all mandatory when it is obviously can't be especially on small and medium sized major schemes.

Why should greenfield sites have any different polices to other schemes and some of the suggested policy seems bizarre e.g. they must not allow rainwater downpipes to be seen by the public

1. Unnecessary Duplication and Policy Overload

The matters addressed by Policy PC7 are already comprehensively covered by:

- Site-specific allocation policies;
- The overarching design policy (Policy PC6);
- Policies relating to open space, movement, landscape, biodiversity and amenity.

As such, PC7 adds another layer of detailed requirements without clear justification. The cumulative effect of multiple overlapping policies makes the Local Plan burdensome, difficult to navigate and potentially inconsistent in application, contrary to the aim of effective plan-making.

2. Excessive Prescription Reduces Design Flexibility

Several criteria impose fixed design outcomes rather than principles, limiting the ability to respond to site-specific circumstances and stifling innovation, including:

- Mandatory centralised open space arrangements;
- Prescriptive frontage requirements at countryside edges;
- Fixed expectations around character areas, nodal buildings and street hierarchies;
- Requirements for consistent application of design features across all elevations, which risks discouraging organic, contextual and contemporary design responses.

National policy promotes good design through flexibility and context-led solutions, not rigid formulae.

3. Inflexible and Unrealistic Requirements

Some requirements are **unrealistic or disproportionate**, including:

- A blanket expectation for brick boundary walls, where alternative treatments such as landscaping or fencing may be more appropriate;
- Detailed requirements for meter housing, service intakes and rainwater goods, which are often dictated by utility providers post-planning and constrained by site-specific factors;
- Parking design requirements that risk conflict with highway standards, viability and density considerations.

These matters are more appropriately addressed through design codes, guidance or reserved matters, not primary policy.

4. Lack of Justification for a Standalone Greenfield Policy

No clear evidence is provided to justify why greenfield sites require a separate, highly detailed design policy, particularly where:

- Allocation policies already establish site-specific expectations; and
- The wider design framework of the Plan applies to all residential development.

The justification text does not demonstrate a policy gap that PC7 is necessary to fill.