



Colchester Preferred Options Local Plan - Regulation 18 Representation

Policy ST8: Place Shaping Principles

We support the objective of achieving high-quality design and placemaking across Colchester and agree that design has a critical role in delivering successful, sustainable development. However, we consider that Policy ST8, as currently drafted, is largely framed around the delivery of large strategic or masterplanned sites and is not readily applicable to smaller or non-strategic developments. As a result, the policy risks being overly onerous, inflexible, and difficult to apply consistently in development management.

Some specific concerns with the policy criteria are set out below:

a) Protecting and enhancing the natural environment - The use of the term “protecting” is overly absolute, as development cannot always avoid impacts entirely. The policy should acknowledge that biodiversity objectives may be met through on-site measures, off-site provision, or the use of biodiversity credits in accordance with the statutory Biodiversity Net Gain framework. Requiring enhancement in all cases goes beyond national policy.

b) Integrated and connected green network and waterways - This requirement is not realistic for most developments. Only large strategic sites are capable of delivering integrated green networks and waterways. For smaller sites, the policy should instead seek proportionate green infrastructure contributions that reflect site constraints and context.

c) Climate change adaptation and resilience - This criterion largely duplicates national policy and building regulations. Repeating these requirements adds limited local value and could be simplified by cross-referencing national guidance.

d) Water efficiency, drainage and flood mitigation - This criterion also repeats national policy and existing regulatory regimes. While the objective is supported, it should be streamlined to avoid unnecessary duplication and policy overlap.

e) Responding positively to local character and context - The expectation to “preserve and enhance” local character is onerous. Development cannot always enhance character, particularly where change is inherent. The policy should focus on *respecting* local character and context rather than mandating enhancement in all cases.

f) Architectural quality and local distinctiveness - Requiring “individual architectural quality” may not be appropriate in every context, particularly where a more restrained or contextual approach is justified. The policy should allow flexibility in design response and avoid subjective or overly prescriptive expectations.

g) Protecting and enhancing historical and natural assets - The requirement to both protect and enhance all assets is vague and goes beyond legislative requirements. Not all assets can be enhanced, and protection should be the primary test, consistent with national policy.

h) Prioritising pedestrians, cyclists and public transport - This criterion is not achievable in all locations, particularly in rural areas around Colchester where public transport options are limited. The policy should recognise different accessibility contexts and avoid absolute expectations that cannot be met everywhere.

j) Enhancing the public realm - This is supported in principle, but should be applied proportionately. Smaller developments may have limited opportunity to provide meaningful public realm enhancements and should not be penalised where opportunities are constrained.

k) Proximity to public transport interchanges - This criterion appears to conflict with the Council's chosen spatial strategy, which allows development in a range of locations. It should be reframed to avoid setting expectations that are inconsistent with the spatial distribution of development.

Alternative Approach

We agree with the alternative option that greater reliance on the **National Design Guide** and the **Essex Design Guide** would provide a clearer, more flexible and nationally consistent framework for assessing design quality. These documents are:

- Well-established;
- Proportionate in their application; and
- Capable of being applied across a wide range of development types and scales.

A streamlined local policy that signposts these guides, rather than replicating or extending their content, would be preferable.