

PETERBOROUGH DRAFT LOCAL PLAN – RESPONSES - based on CD003a Peterborough Draft Local Plan 2024 to 2044 (April 2025) – rev 3.

Section	Sub Section	Page No	Reference	Comment	
Part A – Setting the Scene	1 . Introduction	3	1.8 - History of Peterborough	While reference to the Bronze Age and subsequent Norman history there is no reference to the Roman history particularly in the Lower Nene valley	
		4	1.16 - Neighbourhood Plans	Note: <i>Werrington's Neighbourhood Plan referred to as being 'made' March 2025 and indicated on Designated Area Map</i>	
		6	2.3 - Documents	Note: <i>Schedule of existing documents used in preparation of the Local Plan</i>	
	2. Influences and Overarching Issues	10 & 11	Biodiversity, Geodiversity and Green Infrastructure	This section is repeated on page 11	
	3. Vision	13		No Comments	
	4. Objectives	14	Local Plan Objectives	No Comments	
		15		Note: <i>Local Plan Objectives listed, useful in justification of responses / comments</i>	
Part B – The Spatial Strategy	5. The Spatial Strategy	16	5. The Spatial Strategy - Introduction	No Comments	
		18	Policy LP1: Settlement Hierarchy and the Countryside	It would be useful to define those areas included in the District Centres and urban extensions for clarity. Assume that Werrington for example is included under the description of 'District Centres.' The focus on development for the future should aim to make Peterborough a more attractive environment and protect the existing landscape character.	

		21	Policy LP2: Settlement Hierarchy and the Countryside	Note: <i>This Local Plan meets its housing requirement in full. There is no additional identified housing need to be met through neighbourhood plans or Neighbourhood Development Orders</i>	
		23	Policy LP3: Settlement Hierarchy and the Countryside	No Comments	
		25	Policy LP4: Sustainable Urban Extensions and New Settlements	No Comments	
Section	Sub Section	Page No	Reference	Comment	
Part B – The Spatial Strategy (continued)	5. The Spatial Strategy (continued)	30	Policy LP5: City Centre Regeneration and Overarching Strategy	No Comments	
		32	Policy LP6: Climate Change - Overarching Strategy	No Comments	
		34	Health and Wellbeing	There is little reference to the importance of swimming and community sports with 5.84 etc. The lack of swimming provision especially in the north of the City which is easily accessible by public transport is concerning as is the future of community sports centres. This results in a lack of balance across the area.	
		36	Policy LP7: Health and wellbeing	Incorporation within the policy to propose maintaining, where possible, local healthcare facilities and the development of new Healthcare Hubs to serve the District	

				Centres would improve Health Care and release pressure on the main Hospital facility	
Part C – The Policies	6 Design and Amenity	39	Policy LP8: Design - Part D. Movement	Emphasis on the development of ‘ <i>a well-designed and connected travel network with consideration for all modes of transport,</i> ’ is welcomed and should include the provision of dedicated public transport routes to provide easy and quick alternatives to car travel between key locations / hubs in the local plan area.	
		43	Policy LP9: Amenity Provision	While not directly related, the criteria in regard to public green space should be used in consideration in regard to the potential loss of Public Open space associated with the Ken Stimpson Academy, Werrington Fields	
		49	Policy LP10: Energy Efficiency	Pursuing net zero paragraphs 6.35 – 37 is to be supported in regard to retrofitting existing buildings with a significant proportion of older houses is essential. There are two concerns however: 1.Funding for supporting this retrofit is not provided and: 2.Incorporation of Solar PV into new dwellings should be subject to its incorporation within the design of the dwelling and avoid the appearance of an ‘add on’	

Section	Sub Section	Page No	Reference	Comment
---------	-------------	---------	-----------	---------

Part C – The Policies (continued)	7. Housing	53	Policy LP11: Affordable Housing	It is recognised that the provision of housing for a growing city is required, however why, when paragraph 7.12 says that 51.2% of households who are in housing need can afford only social rent, whereas 7.13 states future housing developments need only aim to provide 30% of social housing.
		59	Policy LP12: Meeting Housing Needs	No Comments
		61	Policy LP13: Homes for Permanent Caravan Dwellers/Park Homes and Boat Dwellers	No Comments
		62	7.67. HMO sizes	The growth of Multiple Occupancy Dwellings is concerning in all areas. Allowing conversion of a small dwelling / property with an occupancy of between 3 and 6 unrelated adults as permitted dwelling seems high, while this may be in conflict with National Policy, consideration to reducing this to up to 3 would be preferable in the District Centres and Village areas, resulting on less stress on local infrastructure i.e. parking and any communal facilities. Allowing and occupancy of up to 6 as being permitted development will also result in this being in conflict with the later Policy LP26 in regard to parking provisions including its enforcement
		63	Policy LP14: Multiple Occupation of dwellings	No Comments
		66	Policy LP15: Custom Build, Self-build, and Prestige Homes	Reference to the consideration of the impact of any proposed development within the curtilage of an existing dwelling should be included in the assessment criteria, which should include parking and access.
		70	Policy LP16: Gypsies and Travelers and Traveling Show people	Planning permission criteria should include that the siting of a Gypsy or Traveller site should consider the proximity / impact on existing dwellings and urban facilities together with any required screening
Section	Sub Section	Page No	Reference	Comment

PETERBOROUGH DRAFT LOCAL PLAN – RESPONSES - based on CD003a Peterborough Draft Local Plan 2024 to 2044 (April 2025) – rev 3.

Part C – The Policies (continued)	7. Housing (continued)	71	Policy LP17: Residential Annexes	Planning permission criteria should include a criteria that any residential annex should include within the site area provision for any additional parking requirement caused by the development
	8. Employment, Economy, and Skills	73	Policy LP18: Employment	No Comments
		76	Policy LP19: University	No Comments
	9. Town Centres	76	9. Town Centres	Would the heading of this section be better described as Town and District Centres as the supporting information refers also to District Centres i.e. Werrington
		77	9.9 Hierarchy of Town Centres	The importance of District Centres needs to be reflected as many residents cannot access the City Centre nor Out of Centre Retail Developments. As referenced in para 9.9 Werrington Centre continues to support a large area and needs urgent maintenance to fulfil its purpose
		79	Policy LP20: Town Centres Part A: Vision for Town Centres development	Encouraging to see <i>‘Protect, support, and where necessary regenerate, existing District Centres and Local Centres to ensure they continue to cater for the needs of the communities they serve’</i>
		82	Policy LP21: Shop Frontages, Security Shutters and Canopies	No Comments
		84	Policy LP22: Leisure, Culture and Tourism	There is little reference to the importance of swimming and community sports within LP22. The lack of swimming provision especially in the north of the City which is easily accessible by public transport is concerning as is the future of community sports centres.
		85	Policy LP23: Community Facilities	There is great irony in the LP’s commitment to supporting community facilities at the same time as the recent PCC budget sold off many council owned community facilities: few of those sold will continue to provide facilities for the public

Section	Sub Section	Page No	Reference	Comment
---------	-------------	---------	-----------	---------

Part C – The Policies (continued)	10. Transport and Infrastructure	87	Policy LP24: Infrastructure to Support Growth	Any proposed development to support the growth of Peterborough must include provision either through Local Authority or private funding to support the expansion of Infrastructure, being roads, public transport, services (Utilities, drainage, flood prevention), health, recreation, retail, and community hubs / activities. Whilst preserving the historical, green open space and Countryside.
		90	Policy LP25: Accessibility and Transport	Criteria should include the provision of dedicated public transport routes to provide easy and quick alternatives to car travel between key locations / hubs in the local plan area.
		91	Policy LP26: Parking Provision	Parking Standards within LP26 and Appendix 4 within a modern housing development is not adequate especially for houses over 3 bedrooms. This standard should be increased to one parking space per bedroom.
		94	Policy LP27: Walking and Cycling Infrastructure	Any proposed development to support the growth of Peterborough must include provision for walking and cycling infrastructure.
	11. Energy and Climate Change	95	Policy LP28: Safeguarded Land for Future Key Infrastructure	Proposed growth for the City and wider Peterborough area should include the provision within both local authority and private developers for implementation of new infrastructure to match the increasing size of the Peterborough. For example: Proposed development areas indicated for Market Deeping and Glinton raises concerns over the capacity at peak times of the A15 Junctions without major upgrading of the existing A15, and could result in increased usage of Davids Lane, Werrington as a cut through.
		96 & 97	Wind and Solar energy	Noted that Local plans no longer require to include any identified sites
		98	Policy LP29: Renewable Energy and Low Carbon Energy Infrastructure	No Comments
		102	Policy LP30: Embodied Carbon	No Comments
Section	Sub Section	Page No	Reference	Comment

Part C – The Policies (continued)	11. Energy and Climate Change (continued)	104	Policy LP31: Flood and Water Management	Proposed developments associated with the growth of Peterborough should take into account and fund the expansion of infrastructure associated with Flood prevention and water management
	12. Historic Environment	106	12.7. heritage assets etc	While reference to the Bronze Age and subsequent Norman history there is no reference to the Roman history particularly in the Lower Nene valley
		110	Policy LP32: The Historic Environment	No Comments
		112	Policy LP33: Special Character Areas	No Comments
	13. Natural Environment	117	Policy LP34: Development in the Countryside - Part F: Protecting the best and most versatile agricultural land	Encouraging to see the criteria to protect Best and most versatile agricultural land
		119	Policy LP35: New Open Space, Sports, and Recreation Facilities	No Comments
		121	Policy LP36: Green Infrastructure	No Comments
		123	Policy LP37: Local Green Space, Protected Green Space and Existing Open Spaces: Part A: Local Green Space	Note: <i>Local Green Space, as defined on the draft Policies Map, or within a 'made' Neighbourhood Plan, will be protected in line with the NPPF, which rules out new development on these sites other than in very special circumstances.</i> Both the land to the south of Ken Stimpson Academy and Brookside Playing Fields were nominated by residents as potential designated Local Green Spaces during the Werrington Neighbourhood plan consultation but have not been included. In particular Brookside Playing Fields has been designated for future housing.

Section	Sub Section	Page No	Reference	Comment
Part C – The Policies (continued)	13. Natural Environment (continued)	124	Policy LP37: Local Green Space, Protected Green Space and Existing Open Spaces: Part A: Local Green Space (continued)	<p>Noted, <i>‘Existing non-designated open spaces will, in principle, be protected from development,’ Some areas of Existing/Important Open Space are protected by their type and are not shown in the draft Policies Map. These Important/Existing Open Spaces are: • churchyards • cemeteries • school playing fields (in use as such) • sports centres/recreation grounds • Local Authority owned allotments</i></p> <p>It has previously been understood that the area to the south of Ken Stimpson Academy (known as Area C) is a ‘school playing field’ and cannot be given a Local Green Space designation. As a result, this area was omitted from the Werrington Neighbourhood Plan on advice.</p> <p>However, the ongoing discussions, debate and meetings have since given significant evidence that this space should now be classed as ‘Shared Space’ rather than ‘Education Land.’ In addition, it has also become apparent that there is a potential precedent of ‘School Playing Fields’ being designated as Local Green Spaces (Reference: Bristol City Council Draft Local Plan Examination which has been subject to High Court review, decision awaited).</p> <p>Resident’s submissions for Area C to be considered as a potential Local green Space, were made before the publication of the draft Werrington Neighbourhood Plan and residents would not have known which areas were being designated by the Neighbourhood Plan. Peterborough City Council therefore needs to make its own assessment under this Local Plan Review. It is clear, given the huge resident interest in the issues surrounding these fields with petitions, protests, and media involvement, together with previous evidence submitted, that this space is ‘demonstrably special to a local community and holds a particular local significance through its beauty and recreational value.’</p>

Section	Sub Section	Page No	Reference	Comment
Part C – The Policies (continued)	13. Natural Environment (continued)	124	Policy LP37: Local Green Space, Protected Green Space and Existing Open Spaces: Part A: Local Green Space (continued)	<p>In the case of Werrington Fields this area gives:</p> <p>Proximity to Local Community: forms the centre of Werrington with its 9000 people and surrounded on three sides by the rear gardens of Houses. Is a popular spot for residents and the nearest open space the original village of Werrington.</p> <p>Beauty: A pleasant outdoor space contributing enormously to the mental wellbeing of the community. It also contains a treelined avenue is a protected view in the Werrington Neighbourhood Plan.</p> <p>History: The hedgerow of Foxcovert Road, is an original medieval field boundary giving access to the original medieval field system. A similar wide tree border and mature hedgerow to the south formed the boundary between 18th century Werrington Hall. Many of the trees are now mature and the areas provides a connection to the open spaces of the past before the development of Werrington.</p> <p>Recreational value: Used for decades as the main area for recreation and leisure by the local community. The area is used for exercise, dog walking, strolling, picnics and is a throughway to schools and work. The fields are crossed by tree lined cycleways and public rights of way linking Lincoln Road and Werrington Centre and the new township to the village.</p> <p>Tranquillity: Remote from main roads, Area C is a hugely valuable tranquil area, important for mental health.</p> <p>Richness of wildlife: Tree belt and mixed hedges provide a vital wildlife corridor. Demonstrably special to a local community A petition against the fencing of part of Werrington Fields was signed by 1350 members of the public. The ‘Save Werrington Fields’ Facebook group has 825 members</p>
		127	Policy LP38: Biodiversity and Geological Conservation	No Comments
		130	Policy LP39: Nene Valley	No Comments
		132	Policy LP40: Embankment	No Comments

Section	Sub Section	Page No	Reference	Comment
Part C – The Policies (continued)	13. Natural Environment (continued)	134	Policy LP41: Trees, Woodland, and Hedgerows	New tree / woodlands should be subject to an agreement that future maintenance will be maintained by either a private developer and or the Local authority
		136	Policy LP42: Peat Soils	No Comments
		138	Policy LP43: Landscape Character	No Comments
		140 -141	Policy LP44: Green Wedges	The inclusion of potential housing development areas to the North of the A15 Werrington Bypass, Glington, and Peakirk LP57.5 & 6 to the south of Peakirk Road, whilst contained within area segregated by the A15 Werrington bypass. These allocations will encroach the villages of Glington and Peakirk onto north Werrington and this conflicts against paragraph 13.90 and policy LP 44 maintaining the Green Wedge. It is considered that this may be a step towards the merging of the urban area resulting in the loss of the limited Green Wedge to the south of the A15.
		142	Policy LP45: Country Park	No Comments
		143	Policy LP46: Development on Land Affected, Contamination	No Comments
Part D – The Sites	14. Introduction	144		No Comments
	15. Residential Allocations	149	Policy LP47: Urban Area Allocations – Proposed New Allocations	LP47.16 Brookside Playing Field, area has been allocated 64 houses. (See response to LP37 above). This number of houses is not appropriate for this site being surrounded by housing on three sides, only one narrow access point on a bend and no other pedestrian/cycle access. The high density of housing would also be out of character with the surrounding area of larger houses on larger plots. A lower number of allocated houses is needed for this area.

Section	Sub Section	Page No	Reference	Comment
Part D – The Sites (continued)	15. Residential Allocations (continued)	149	Policy LP47: Urban Area Allocations – Proposed New Allocations (continued)	LP47.18 Werrington Centre: This is an historic allocation. The current available space is not able to accommodate the 100 allocated houses. As has been demonstrated by the two recent planning applications (for flats and a care home), a high-density development would be out of character with the surrounding local area and parking standards cannot be met. This can be demonstrated by the substantial use of the current vacant space for parking associated by the adjoining commercial development, 'Olympus House,' without any additional development taking place. This number of allocated houses continuing gives unrealistic expectations, highlighted by the rejection of the previous two planning applications for the lack of space for such a high-density development with adequate parking. A lower number of allocated houses is needed for this area.
		150	Policy LP48: Site specific policies: Middleholme	No Comments
		151	Policy LP49: City Centre	LP49.8 Wellington Street, LP49.9 Dickens Street, LP49.12 Pleasure Fair Meadow car park, LP49.17 Brook Street, car parks. The above proposed locations are indicated within the city centre area for dwelling development. While the long-term aspiration of the Plan is for improvements in Transport / Infrastructure, premature loss of these areas without alternate locations being designated will result in parking issues
				Policy LP49.13 identifies areas for new housing which include the land presently occupied by the Green Backyard. Loss of this creative, valuable facility to provide a few houses would be an enormous loss to the life of the city and is vital green community space located amongst an urban landscape of flats, housing that positively affects our local environment, health and communities, a vital lifeline for children and adults. in area of deprivation

Section	Sub Section	Page No	Reference	Comment
Part D – The Sites (continued)	15. Residential Allocations (continued)	152	Policy LP50: Station Quarter Opportunity Area	Previous comments have been made during the earlier consultation in regard to access by vehicles to the Western station entrance.
		152	Policy LP51: North Westgate Opportunity Area	No Comments
		153	Policy LP52: Boongate Opportunity Area	No Comments
		154	Policy LP53: Urban Extensions and New Settlements	No Comments
		155	Policy LP54: Land at Deeping Gate	No Comments
		155	Policy LP55: Land North of Castor and Ailsworth	No Comments
		156	Policy LP56: Large Village Allocations	No Comments
		157	Policy LP57: Medium Village Allocations Proposed New Allocations	LP57.5 Land at Lincoln Road, Glington, and LP57.6 Land South of Peakirk Road, Glington. Allocated for potential housing areas will encroach the villages of Glington and Peakirk onto north Werrington and this conflicts against paragraph 13.90 and policy LP 44 maintaining the Green Wedge. In addition, the proposed developments will cause a substantial impact on the infrastructure and circulation within the existing villages which needs to be addressed. The inclusion of an access road from the existing Clare Lodge access road or A15 roundabout should be considered.
	16. Employment Allocations	158	Policy LP58: Land Between West Street and Broadwheel Road, Helpston	No Comments
		159	Policy LP60: Strategic Employment Allocations	No Comments

PETERBOROUGH DRAFT LOCAL PLAN – RESPONSES - based on CD003a Peterborough Draft Local Plan 2024 to 2044 (April 2025) – rev 3.

Section	Sub Section	Page No	Reference	Comment
Part D – The Sites (continued)	16. Employment Allocations (continued)	160	Policy LP61: Land to the northeast of Stanground	No Comments
		161	Policy LP62: Employment Allocations	LP62.2, Former Parcellforce Site Maskew Avenue New England Peterborough. While this has been included in the table our understanding is that this area has been developed and therefore employment opportunities already exist
Part E – Policies Map	Appendix 1 Glossary of Terms	165		No Comments
	Appendix 2 Neighbourhood Planning	168	Compliance of Neighbourhood plan	<i>Neighbourhood Plans are required to meet the basic conditions as set out in legislation. One element of this is that a Neighbourhood Plan must be in general conformity with the strategic policies contained within the Local Plan. WNP ‘made’ in compliance with</i>
		168	Housing Requirement for Neighbourhood Area	<i>Note - Paragraph 66 of the NPPF requires Local Plans to set housing requirements for all designated neighbourhood areas through its strategic policies. Therefore, the new Local Plan for Peterborough must set housing targets for the 14 formally designated areas.</i>
		171	Table 10 - Local Plan Requirement 2024 to 2044	<i>Reference to 100 dwellings in Werrington - Whilst the policies in Part D are considered non-strategic, each plays an important role in delivering the housing and jobs growth needed across the district, which is a strategic priority. Attempts to reduce the overall amount of development likely to be delivered within a settlement through a neighbourhood plan or Neighbourhood Development Order could result in conflict with the Local Plan’s strategic policies, meaning the plan or Order may not satisfy the basic conditions. Refer to response under LP47.18</i>
	Appendix 3 Open Space Standards	172	Appendix 3 Open Space Standards	<i>To be updated and consulted upon at the proposed submission stage – when will this be released</i>

Section	Sub Section	Page No	Reference	Comment
Part E – Policies Map (continued)	Appendix 4 Parking Standards	173	Appendix 4 Parking Standards	The current proposal within the local plan quotes – ‘A car / van parking space should measure 5m × 2.5m.’ While these dimensions are greater than the 4.8 x 2.4m current guidelines. We should be considering a greater increase in these dimensions based on increasing vehicle sizes with a preferred bay standard for cars being 2.9 x 5.5m.
		175	C4 – Houses in multiple occupation (no more than six residents)	No of parking spaces – refer to responses to LP26
	Appendix 5 Bin Storage and Collection	178	Appendix 5 Bin Storage and Collection	No Comments