

Cabinet – 12 October 2009

**Peterborough Local Development Framework: Peterborough
Core Strategy (Proposed Submission Version)**

**Summary of Main Issues Raised in Comments on the
Preferred Options Core Strategy and Main Changes made for
the Recommended Submission Version**

The Preferred Options version of the Core Strategy was published for public consultation in 2008. There were 878 comments received. The Council must take into account the comments that were made in preparing the next version of the Core Strategy – the version that will be submitted to the Secretary of State. This report presents a summary of the main issues raised in comments and a summary of the main changes to the Core Strategy that are now included in the submission version which is recommended to Cabinet.

(References to policy and paragraph numbers are to those in the Preferred Options version; some of these will have changed for the recommended Submission version.)

Chapter 1 - Introduction

Comments on Preferred Options Version

28 representations in total - 6 in support, 9 objections and 13 making general comments or suggesting changes

Only a few of the representations were specifically related to this Introduction chapter. The majority were general remarks about the whole Core Strategy and its process; or comments which the respondent should have attributed to another part of the document.

Main Issues Raised

Wide variety of unrelated issues. Not enough detail. Too much detail. Overall support. Too long. Key Diagram is unclear. Should include minerals and waste, and waste management policies. Important to regenerate the station area. Document must be consistent with national policy and guidance; must rely on evidence from the SHMA and the SHLAA; and must recognise the need for market-led development. Important to address gaps in understanding and information. Can we have more parks, gardens, lakes and smaller properties for OAP's. Concerned that recent national economic events mean that many of the forecasts/ proposed developments will not happen as planned. Need for more affordable homes in villages.

EERA conclude that there is no significant divergence from the Regional Spatial Strategy, and therefore the Core Strategy would be in general conformity.

Go-East comment that it is not clear how the Environment Capital status aspiration will be achieved, and emphasise the importance of evidence to justify demanding environmental standards, or otherwise such policies ought to be removed

Recommendations from Sustainability Appraisal

As this is an introductory chapter, with no objectives or policies, there are no recommendations from the Sustainability Appraisal.

Recommended Changes to the Core Strategy

- Update the Introduction chapter so that it is relevant for the submission version of the Core Strategy, rather than the Preferred Options version.
- Amend the Key Diagram to show the location of the urban extensions more clearly.
- Make any necessary changes throughout the document arising from new evidence from the Water Cycle Study, transport modelling and other new evidence sources.
- In chapter 4, change the subheading above para 4.0.15 to 'City and District Centres'.

- Incorporate more references to the way in which policies will help to achieve the Environment Capital aspiration of the Plan, including replacing policy CS9 with a new Environment Capital policy.
- Revise policy CS10 and write the new Environment Capital policy in the light of more recent Government guidance on issues of renewable energy, energy efficiency and low-carbon/zero-carbon development
- Update paras 2.4.1 to 2.4.4 to reflect the more recent Regional Economic Strategy 2008-31

Chapter 2 – Influences and Overarching Issues

Comments on Preferred Options Version

44 representations in total - 8 in support, 22 objections and 14 making general comments or suggesting changes

Main Issues Raised

Wide variety of unrelated issues – many respondents attributed their comments to this chapter, when they were really making comments about the Plan as a whole.

Support for joint working between PCC and OP. There has been no prior consultation with the HBF. All the documents that form the evidence base should be listed in the document. Object to the absence of policy to prevent coalescence of villages. Suggest that Great Haddon should be an Eco-Town rather than Hanley Grange (Cambs). The Core Strategy doesn't reflect the outcome of the IGS accurately enough in that it weakens the proposals for high densities. Opposed to high density development, because it will not achieve a high quality of life. Opposed to the proposed Magna Park development, which seems contrary to many of the key issues identified. Plan proposals do not take natural environment issues into account sufficiently. Council should ignore central Government dictats and deliver what is best for Peterborough. The LTP2 is a poor transport strategy and the Core Strategy should ignore it. Reference should be made to the PCT's Strategic Service Delivery Plan, the Peterborough Green Grid Natural Networks Strategy, the Peterborough Green Parks Delivery Plan, the Regional Woodland Strategy for the East of England and various other specific plans and strategies. The consultation has been a sham and no faith in the outcome of earlier consultations. Peterborough should focus on trying to attract high-skilled jobs.

Lincolnshire County Council concludes that the strategy is consistent with plans for Lincolnshire.

The Highways Agency has asked for further transport modelling as it remains to be convinced that the preferred option will work.

Go-East comment that due to the large number of issues and objectives identified (through the IGS) it is not clear what are the top priorities of the Core Strategy.

Recommendations from Sustainability Appraisal

As this is an introductory chapter, with no objectives or policies, there are no recommendations from the Sustainability Appraisal.

Recommended Changes to the Core Strategy

- Make general updates throughout the section to reflect the fact that this is now the submission Core Strategy rather than the Preferred Options document.
- Re-write section 2.3 to summarise the final versions of both the East of England RSS and the East Midlands RSS, which have been published since the Preferred Options Core Strategy.

- Re-write section 2.4 to summarise the new Regional Economic Strategy 2008-2031, which has been published since the Preferred Options Core Strategy, and reflect this throughout the remainder of the document.
- Delete reference to the PCC Corporate Plan 2007-2010, which is now out of date and superseded by the Sustainable Community Strategy.
- Update the summary of the Local Transport Plan to refer to the Long Term Transport Strategy and its relationship with LTP3.
- Re-write section 2.9 to summarise the new PCC Housing Strategy Statement, which has been published since the Preferred Options Core Strategy.
- Add a summary of the PCT Strategic Service Development Plan into the list of other plans and strategies which have had a bearing on the Core Strategy.
- Bring sections 2.12 (Sustainability Appraisal) and 2.13 (Habitats Regulations Assessment) up to date following completion of these areas of work.
- Delete reference to the March 2006 stakeholder workshops (paras 2.14.3 and 4).

Chapter 3 – Our Vision for the Future of Peterborough

Comments on Preferred Options Version

41 representations in total - 20 in support, 5 objections and 16 making general comments or suggesting changes

Main Issues Raised

There was a good level of support for the overall vision and individual elements within it (including support from EEDA, EERA and the EA).

Some respondents sought various minor changes to the wording of the Sustainable Community Strategy vision statement.

Other specific comments included:

Support for the vision for transport but doubtful that the proposed policy would deliver it; and support for the vision for housing but doubtful that the proposed housing mix would deliver it. The vision is too aspirational, and does not reflect the reality of life in Peterborough today. The vision for the environment should seek to enhance local environmental assets, not just protect them. It should be made clear that 'infrastructure' includes social, community and green infrastructure, as well as physical elements; also, the infrastructure element of the vision warrants greater prominence in the chapter. The development of Magna Park would not be in accordance with the vision statement. It is not clear from the vision what is locally distinctive about Peterborough. 'Sustainable development' should be defined in the vision.

Recommendations from Sustainability Appraisal

As this a chapter which sets out a vision for the area, with no objectives or policies, there are no recommendations from the Sustainability Appraisal.

Recommended Changes to the Core Strategy

- Amend part 3.0.9 of the vision so the heading refers to 'Climate Change, Sustainability and the Natural Environment' and amend the text to refer to the 'protection **and enhancement** of the area's existing environmental assets...'
- Move part 3.0.13 of the vision, relating to infrastructure, to earlier in the vision statement (prior to 3.0.4). Amend to refer to '...increased **physical, social, community and green** infrastructure...'

Section 4 – Our Objectives

Comments on Preferred Options Version

43 representations in total - 19 in support and 24 objections/suggesting change

Main Issues Raised

- A number of issues related to policies or separate sections rather than the objectives section itself e.g. 'Magna Park' and were hence better addressed through those sections.
- Majority of representations involved minor edits to objectives or inclusion of reference to specific elements within the objectives e.g. seeking reference to ancient woodlands in objective OB20: Sites of Environmental Importance and seeking reference to a design-led approach in objective OB9: Housing Quality and Density, rather than wholesale changes to objectives.
- The unique opportunities presented by an enhanced River Nene were mentioned more than once.
- There was an appetite for objective OB14: District Centres to aspire to a greater mix of uses to enable long term vitality and viability.
- There was a desire to protect city centre vitality/viability from out of town (retail) development and ensure it remains top of the retail hierarchy in the East of England region.

Recommendations from Sustainability Appraisal

'Although potential conflicts have been identified through the appraisal of the Core Strategy objectives set out in the Preferred Options DPD, most of these conflicts are expected to be mitigated by other objectives in the Core Strategy.'

However, in the case of a small number of Core Strategy objectives, it is recommended that amendments are incorporated in order to reduce the likelihood of potential conflicts with the SA objectives:

1) Core Strategy objective OB3: Urban and Rural Character and Distinctiveness

In order to ensure that significant City Centre development can be delivered whilst protecting the historic environment of Peterborough City, it is recommended that this Core Strategy objective is amended to include reference to the need to protect the historic environment in urban areas and to harness the historic environment as a catalyst for regeneration within the overall proposals for development and change in the city.

2) Core Strategy objective OB13: City Centre

Although it may not be necessary to include wording relating to the need to protect the Nene Washes SPA and Ramsar site within this objective, as the need to protect Peterborough's environmental assets is covered elsewhere in the objectives, there is a need to test this objective through Appropriate Assessment, in order to assess whether it is deliverable. If it is not possible to deliver this objective whilst protecting the integrity of this European site of nature conservation, it should be revisited.

3) Core Strategy objective 20: Sites of Environmental Importance

Similar to Core Strategy objective OB13, there is a need to assess this objective through the Appropriate Assessment process in order to conclude whether it can be delivered alongside objectives which aim to increase housing and economic development. It is recommended that this objective remains unchanged, but it may be necessary to adjust other objectives following the Appropriate Assessment’.

In response to SA recommended amendment 1 we have incorporated changes to Objective OB3 to reflect the need to both preserve and enhance the City’s historic environment to provide local distinctiveness and provide important focal points.

Recommended amendments 2 and 3 need to be considered in the light of the subsequent Appropriate Assessment undertaken by Land Use Consultants in January 2009. Their overall conclusion stated: “*We conclude that, subject to the changes recommended to policies CS4, CS10 and CS21, the Core Strategy Preferred Options will not adversely affect the integrity of Nene Washes SAC, SPA and Ramsar*”. This has been interpreted to mean that there are no further direct implications for the objectives as they are currently defined.

Recommended Changes to the Core Strategy

- Greater emphasis on historic environment in OB3.
- Amend OB9 to refer to a design-led approach to densities.
- Retain focus on City and District Centres for objectives OB13 and OB14 and remove reference to Village Centres in the heading.
- Amend OB19 to refer to adapting to climate change
- Add reference to Natural Environment in the heading to objectives OB18-OB20 and make additional reference to ancient woodlands and veteran trees.
- Add an additional detailed objective relating specifically to the River Nene under the Recreation, Leisure, Culture and Open Space Section (to become OB24 with resulting implications for numbering remaining objectives).
- Extend the period of the plan from 2021 to 2026 where it is referred to in objectives OB26 and OB27
- Add a concluding paragraph to highlight the overall message/priorities from the vision and objectives.

Chapter 5 – The Spatial Strategy, the Scale & Location of Residential Growth (including policy CS1)

Comments on Preferred Options Version

109 representations in total - 36 in support, 29 objections and 44 making general comments or suggesting changes

Main Issues Raised

There was a good level of support for the preferred spatial strategy, the overall number of dwellings to be distributed and their proposed distribution. EERA, EEDA and EMRA all expressed general support. Given the scale of development proposed for Great Haddon and Norwood, there was remarkably little opposition to these.

Other views:

- Urban extensions should only be developed after residential development in the city centre and urban area
- Welcome the fact that there is no attempt to phase urban extensions after residential development in the city centre and urban area
- Support for planning beyond 2021
- The total number of dwellings being planned should be considerably reduced
- The policy does not provide enough flexibility if some sites do not deliver
- The housing figure for Great Haddon should be revised to reflect the most recent analysis/calculations for the site
- The city centre dwelling figure should be a minimum, not a ceiling, and all city centre residential development should take place before urban extensions
- Support for the scale of growth proposed for Eye/Eye Green and Thorney (Key Service Centres)
- There should be more development in the Key Service Centres and Limited Growth Villages
- Disagree with the scale of growth proposed for the villages
- Support the figure of 500 more dwellings for Limited Growth Villages
- Thorney should not be a Key Service Centre. The scale of growth at Thorney should be proportionate to the scale and character of the village
- All villages should receive some housing growth
- Ginton is suitable for more growth and should be allocated at least 100 more dwellings
- Opposed to further growth at Ginton. Development at Ginton should accord with wishes of local people.
- Growth should be vertical (blocks of flats) in the urban area, not outward expansion onto farmland
- Various individual sites in villages proposed for development
- Object to 'town cramming' of more development into the urban area/ city centre
- Object to high densities. Densities should be determined by design/masterplanning, not set out by the Core Strategy
- Opposed to further housing development around Orton Centre
- Opposed to substantial high density development around Werrington Centre
- Studies into the potential for growth around district centres should be undertaken in consultation with appropriate community representative organisations
- Support further housing development around Orton Centre

- As Paston Reserve has planning permission, the Core Strategy should not say that this must be revisited in conjunction with the planning of Norwood
- Remain to be convinced that the scale of development can be achieved without adverse impact on the trunk road system
- Core Strategy does not consider flood zones in assessing capacity for growth
- Core Strategy will need to rely on the Water Cycle Study, Level 2 Flood Risk Assessment and other studies; and should consider phasing development with the provision of infrastructure
- Pleased to see a housing trajectory
- The housing trajectory is inadequate and needs more detailed information

Recommendations from Sustainability Appraisal

The SA recommended that the impacts of the Preferred Option should be analysed using the IRM to reduce the number of impact areas where effects are uncertain and to facilitate comparison with other options. The impacts on water resources and water quality should be re-examined in the light of the Water Cycle Study before the strategy is finalised.

Recommended Changes to the Core Strategy

- Update all the baseline dwelling figures to 2009 and, as a result, show 25,450 dwellings as the outstanding requirement to 2026
- Amend the proposed dwelling figure for Great Haddon from 6,000 to 5,300.
- Increase the proposed dwelling figure for the city centre, to reflect the larger city centre boundary as identified via the City Centre Area Action Plan work.
- Decrease the proposed dwelling figures for District Centres, the Urban area, Hampton, Key Service Centres and Limited Growth Villages, as a result of the shorter time period starting from 2009.
- Amend para 5.3.6 to explain that the residential density for new development in the city centre will vary according to location and surroundings, averaging in the region of 100dph.
- Amend para 5.3.8 to refer to the possibility of masterplanning or other studies to examine the potential for more dwellings in and adjacent to district centres. In policy CS1, refer to such studies being undertaken in consultation with appropriate community representative organisations.
- In paragraph 5.3.13, refer to the opportunity to revisit the plans for Paston Reserve, in combination with Norwood. In the policy, separate the figure for dwellings at Paston Reserve from the figure for dwellings at Norwood.
- Delete reference to any figure for housing in the countryside in policy CS1.
- Amend the housing trajectory to bring it up to date to 2009 and provide additional information about the potential sources of housing delivery in the Implementation and Monitoring chapter.

Chapter 5 – Economic Scenarios and the Scale & Location of Employment Growth (including policy CS2)

Comments on Preferred Options Version

38 representations in total - 16 in support, 6 objections and 16 making general comments or suggesting changes

Main Issues Raised

(a) The Economic Scenarios

There was a good level of support for the preferred economic scenario, and general agreement with the actions needed to deliver it. Some doubt was expressed about as to whether the economic aspirations could be achieved at a time of recession.

(b) The Scale and Location of Employment Growth

There was general support for policy CS2, with a minority wanting more employment land at Norwood and in villages; and support for more city centre offices.

There was also widespread support for the proposed overall scale and distribution of employment land. EERA supports the policy and text, which is consistent with the RSS. EMRA say that the policy accords well with the approach in the East Midlands.

Some minority views:

- Retain the allocated employment sites at Thorney and Eye Green
- Agree with the deletion of the allocated employment sites at Thorney and Eye Green
- There should be marginally more employment land available in villages
- There is a need to allocate more than 233 hectares of new employment land
- The city centre should be the preferred location for all new offices
- There is no demand for new office building in the city centre
- The Red Brick Farm allocation is too large
- The Red Brick farm allocation should include B8 uses as well as B1 and B2
- Concerns about potential floodrisk at Red Brick Farm
- The figure for employment land available at Great Haddon should be increased to 65 hectares and reference to an environmental cluster should be deleted.
- Alwalton Hill should be shown on the Key Diagram

Recommendations from Sustainability Appraisal

None of the SA recommendations for the spatial strategy were specifically related to the economic scenarios or the scale and location of employment development.

Recommended Changes to the Core Strategy

- Increase the amount of employment land to be found in villages from 2 to 3 hectares.
- Amend the final paragraph of policy CS2 to refer to vertical as well as horizontal mixing of uses in mixed-use developments.

- In the first paragraph of policy CS2, replace 'including' with 'including bodies such as' and delete reference to the Peterborough Regional Economic Partnership.
- Amend the key diagram to show the general location of the Alwalton Hill employment area.
- In the final sentence of paragraph 5.7.14, insert 'or re-allocated' after 'de-allocated'.
- In paragraph 5.5.13, change '2007' to '2008'.
- Delete Red Brick Farm as an allocation for employment growth in the policy and text, as a result of revised EA flood zone mapping and evidence from the Level 2 SFRA. In its place, include a general reference to further employment land allocations in and around the edge of the urban area.
- Amend the third paragraph of Policy CS2 to refer to provision of between 215 and 245 hectares of employment land.
- Amend the fourth paragraph of policy CS2 to refer to approximately 65 hectares at Great Haddon.
- Amend para 5.7.10 to refer to approximately 65 hectares of employment land and remove the reference to 10 hectares for an environmental cluster.
- Make appropriate changes to table 5 to correspond with these amendments.

5.8 Regional Freight Interchange

Comments on Preferred Options Version

56 representations in total - 3 in support and 53 objections/suggesting change. Reference to additional signatures gathered by way of petition, but the petition was not submitted.

Main Issues Raised

The Magna Park proposal is large, complex and of regional significance. It is inevitable that proposals of this scale will have competing benefits and problems. Issues include:

- pollution (noise/light/air/etc);
- flood plain loss and flood safety;
- loss of greenfield;
- loss/gains of habitat and biodiversity (on and off site);
- loss of mineral reserves;
- strategic transport issues (rail and road);
- local transport issues (access, congestion, junctions etc);
- creation of jobs (and type of jobs);
- hours of operation;
- visual impact on the landscape (including countryside and cathedral views);
- enforcing maximum use of railway for site operations;
- impact on local residents during constructions phase;
- impact on local residents during operation of site;
- ability for local infrastructure network to cope with demand (eg power);
- whether Peterborough is the most appropriate location for a regional interchange; and
- a whole host of more detailed design considerations should the principle in favour be established.

Recommendations from Sustainability Appraisal

No recommendations, due to the original SA not being undertaken for this site as there was no policy in the Preferred Options Core Strategy.

The revised SA is due to report shortly and may affect the policy wording.

Recommended Changes to the Core Strategy

The policy and supporting text has been substantially re-drafted.

It is now recommended to insert a policy which will begin by stating: "Subject to completion, by the prospective developers, of a clear evidence base which addresses all the relevant issues, the Council will support the principle of the development of a strategic regional road/rail freight interchange on land to the north-east of Stanground." There will be a list of key issues to be addressed, and reference to the need for a planning obligation if planning permission were to be granted. The policy makes specific reference to the need for Habitats Regulations Assessment.

Policy CS3 Urban Extensions

Comments on Preferred Options Version

Total of 37 comments received

Agree – 15

Disagree – 8

Suggest a change or general – 14

Main Issues Raised

There are several objections to the requirement that the permitted plans for Paston Reserve should be modified to incorporate Norwood to create a single comprehensive development area. The council can not place such a requirement on the developer and therefore the policy wording will be changed to ensure that the development at Norwood will be designed to be sympathetic to the permitted scheme.

There is a suggested change for a phasing policy, as set out in the IGS, which will ensure priority is given to the City Centre and existing urban area before any urban extensions should be developed. It was not considered that a phased approach to housing growth would be appropriate or deliverable under the planning system. For instance a planning application for an urban extension could not be refused as premature if it were submitted before all of the sites within the existing settlement boundaries had come forward. Such an approach could result in the Authority failing to meet the housing targets set out in the RSS given the long lead in times for development, particularly in respect of new urban extensions. No change to the policy is, therefore, recommended.

A number of objections refer to the specific mention of a density requirement of 50 dwellings per ha in all urban extensions. The overriding objective of this requirement was to ensure the delivery of well designed schemes containing a range of housing size and type. Although the preferred options policy required an overall average density of 50 dph, this requirement will be removed and reliance will be placed on national guidance in terms of density and design, taking into consideration the context of the surrounding area.

There are a number of suggestions that the policy should place more emphasis on the importance of sustainable development and should also include reference to water efficiency. The policy will be amended to include this.

There are a few objections to the requirement for urban extensions to include provision for gypsies and travellers. It is appropriate for provision of pitches to be sought in major urban extensions, which is in accordance with national and regional policy.

Objections have also been received in relation to the final bullet point and the treatment of the edge of urban extensions. It is claimed that the Preferred Options wording restricts uses on urban fringe and assumes further phasing of development will never occur. The last bullet point will be changed to clarify how edges of urban extensions are to be treated, but policy will not refer to uses.

A number of suggested changes to include B8 uses in Redbrick Farm have also been received. But as the development at Redbrick Farm is no longer proposed as an urban extension, no change is required.

Recommendations from Sustainability Appraisal

General recommendations from the Sustainability Appraisal relating to the spatial strategy as a whole are covered in the 'Spatial Strategy' summary sheets. There are none specifically about policy CS3.

Recommendations from Habitats Regulation Assessment

This said "The general area proposed for Great Haddon Urban Extension by the Core Strategy key diagram overlaps Orton Pit SAC. In order to avoid threat to the integrity of the SAC through direct loss or damage to habitat we recommend that new text be added to this policy to the effect that subsequent site specific allocations must avoid the footprint of the SAC".

Response: The Core Strategy is a strategic document. The key diagram will be amended to address other issues; however it is conceptual and will not define the site boundary. Policy CS20 makes it clear that national nature conservation policies will apply. Changes will be made to the wording of the policy to ensure the importance of the SAC is taken into consideration; this issue is discussed in detail below.

Recommended Changes to the Core Strategy

There are several changes to the policy and accompanying text; the main changes have been summarised as:

Introduction:

- Paragraph 5.9.3 replaced with "A new urban extension is proposed at Norwood, adjacent to Paston Reserve which has permission for some 1250 dwellings with associated community facilities. Development at Norwood should give consideration to and be designed so that it is sympathetic with the permitted scheme at Paston Reserve in order to create a single comprehensive development area"
- Paragraph 5.9.4 delete "effectively extending Hampton to the south and west" and replace with "It is envisaged that this will function as a self contained settlement but also as part of a linked community with Hampton and the village of Yaxley to the south and east."
- Insert measures to increase water efficiency to paragraph 5.9.7 to read "using new technologies in the design and construction of buildings to maximise renewable and low carbon energy sources, include measures to increase water efficiency, incorporate effective waste management facilities...."

Policy:

- 2nd paragraph amended to read "Proposals for the Norwood urban extension should give consideration to and be designed so that it is sympathetic with the permitted scheme at Paston Reserve in order to create a single comprehensive development area"
- Delete references to Redbrick Farm due to floodrisk issues.

- The list of bullet points has been summarised to combine a number of issues, and points which are covered by other policies in the Core Strategy have been removed. The first sentence of the third paragraph is amended to read: “Development of each new urban extension must comply with all the relevant development plan documents including other policies set out in the remainder of the Core Strategy, and must be planned and implemented in a comprehensive way that is linked to the delivery of key infrastructure. In particular, site specific issues relating to each of the urban extensions at Great Haddon and Norwood should :”
- Combine 1st and 2nd bullet points and remove reference to an overall net residential density of approximately 50dph
- Remove the references to the quantity of employment land.
- Amend the bullet point relating to education provision to read “incorporate nursery, primary and secondary schools and either a special school or enhanced provision for pupils with special educational needs”
- 7th bullet point reduced to “provide a network of open spaces for play, sport and recreation, including local nature reserves, woodlands and green spaces.
- Last bullet point modified to remove term “defined edge” policy to read “incorporate appropriate landscape treatment to ensure that the development can be satisfactorily assimilated into the surrounding landscape”
- An additional paragraph have been added to the policy covering specific issues relating to Great Haddon which require detailed consideration, the main issues relate to the treatment of the SAC.

Policy CS4 - Key Infrastructure

Comments on Preferred Options Version

26 representations in total – 7 in support, 19 objections/suggesting a change

Main Issues Raised

The policy currently identifies a selection of key infrastructure schemes. Comments, notably from the Government office and the Environment Agency, highlight that further information is required to understand the infrastructure requirements of the Core Strategy. Dependencies, costs, timing and responsibility were all details that need to be drawn out in the revised version of the Core Strategy.

Other specific comments included:

Support for the evidence base documents including the Water Cycle and Energy Studies. The importance of transport infrastructure including junction improvements should be reflected in the Core Strategy.

Recommendations from Sustainability Appraisal

Many of the infrastructure proposals set out in this chapter appear in the second Local Transport Plan (LTP2), and have already been appraised in more detail in the SEA of that plan. The remaining proposals were considered to be too general to appraise them. There are therefore no recommendations from the Sustainability Appraisal.

Recommended Changes to the Core Strategy

- Revise the infrastructure policy so that it does not list any schemes, but deals with the relationship between infrastructure and development. Move the policy so that it appears immediately before the policy on developer contributions to infrastructure.
- Refer to the Integrated Development Plan (IDP) which will provide an up to date, detailed information source for items of infrastructure to support the Core Strategy.
- Revise the structure and content of the Implementation chapter, with additional details, to comply with the requirements of PPS12 (2008) and the comments received in the consultation.

Policy CS5 Settlement Hierarchy

Comments on Preferred Options Version

Total of 39 comments received

Agree – 19

Disagree – 11

Suggest a change – 7

Not specified - 2

Main Issues Raised

Most of the objections to this policy focused on the classification of Thorney as a Key Services Centre and Ginton as a Limited Growth Village. The objectors claim that Thorney should be classified as a limited growth village as several shops have closed and bus services have been reduced. There are also claims that Ginton should be a Key Service Centre due to its proximity to Peterborough and the presence of a secondary school. In contrast there were also representations in support of the currently proposed classification.

As a result of these comments an update of the Settlement Hierarchy study was carried out in early 2009. This concluded that although several shops had closed there was no justification to change any village's position in the Settlement Hierarchy.

There were also a number of requests for more information on the number of dwellings proposed in each village. This issue is covered by Policy CS1 and the detailed information will be contained in the emerging Site Allocations DPD, therefore there is no change required.

Go-East commented that the settlement Hierarchy should reflect the spatial strategy – for example, by including reference to District Centres.

Recommendations from Sustainability Appraisal

Early concerns from the SA process were addressed before preferred options consultation; therefore no significant negative effects identified; only positive outcomes highlighted.

Recommended Changes to the Core Strategy

- 1st Bullet point changed to read:
“ THE CITY OF PETERBOROUGH (including the existing urban area, City Centre, District Centres and proposed urban extensions)

Policy CS6 Meeting Housing Needs

Comments on Preferred Options Version

A total of 56 comments have been received.

Agree – 14

Disagree – 14

Suggest a change – 28

Main Issues Raised

The majority of comments received suggest changes to the policy, particularly relating to the proposed housing mix, affordable housing requirement and tenure split.

- Housing mix

There is general agreement and support for the policy to encourage developers to provide a wide range of dwelling types and size to secure balanced and mixed communities as well as to meet the needs of all members of the community. However, there are a significant number of objections to the housing mix specified in the policy particularly in relation to market housing.

The majority of objections received state that this approach is too prescriptive and object to the “one size fits all” approach. It is believed that the mix of housing should be left to the market to determine. If the policy is too prescriptive it will not allow the market to respond to changing circumstances and the Core Strategy will be out of date.

Also a number of concerns were raised that site-specific issues were not being taken into consideration, such as the ability for City Centre sites providing 40% four bedroom properties and rural areas to deliver 40% one and two bedroom properties. Therefore it is suggested that the housing mix is a target that is only imposed for large schemes, such as urban extensions, and used for monitoring purposes.

Many of the RSLs object to the proposed mix of housing in the social rented sector, particularly the requirement to provide 34% one bed properties; this is seen as unattractive with little demand.

- Affordable housing

A number of objections were received against the policy requirements to provide 35% affordable units as this would result in many schemes being unviable. Many objectors could see no justification for 35%, other than the RSS which is only a target and therefore the requirement should be lowered.

On the other hand there was also support received for the provision of more affordable housing and for the percentage to be increased to meet local need, including a request for the percentage to be increased to 50%. However, it was acknowledged that this must be viable. It was suggested that the affordable housing requirement should be set as a target and not as an absolute requirement, to allow for flexibility.

Generally there was support for the affordable housing threshold to be set at 15 dwellings as this will not affect the viability of smaller sites. However, there were a number of suggestions to lower the threshold in rural areas as there is a particular need identified in the villages, and due to the size of many schemes proposed for small and medium size villages there appears little scope to deliver the affordable housing requirements through the proposed site size threshold.

- Rural exception policy

Because of the concerns relating to the provision of affordable housing in rural areas, there was general approval for the inclusion of the rural exception policy and support for the criteria based approach. But there were still a number of objections and concerns raised as this approach will result in the loss of greenfield sites whereas a lower threshold in rural areas would allow for more provision within existing village boundaries.

- Tenure split

There are a number of objections to the proposed tenure split of 70% social rented and 30% intermediate homes, as it is argued that this split is not viable and would restrict the provision of shared equity and key workers homes. It was suggested that the requirement is changed to a 50/50 split and that any tenure split should be an aspiration.

- Lifetime homes

A few comments were received relating to need for the policy that set provision for lifetime homes as this is not a strategic issue to be address through the Core Strategy and it will become part of national guidance in 2013.

Recommendations from Sustainability Appraisal

The results from the SA identified no significant negative effects arising from the preferred approach. There would be significant positive effects in relation to the following sustainability objectives: help make suitable housing available and affordable for everyone; support rural communities and rural practices to make a vibrant rural economy. The mix of dwelling sizes is supported by evidence from the SHMA. In terms of affordable housing, the SA notes that the proportion sought is lower than that calculated by the SHMA and notes the reasons for opting for this lower figure. The same applies to the social rented/intermediate split. The preferred option performs better than alternative options as far as the threshold for affordable housing is concerned. Finally, the SA concludes that the Lifetime Homes element of the preferred option performs better than other alternatives.

Recommended Changes to the Core Strategy

- The policy has been changed to remove the specific breakdown of housing mix. The policy now includes a more general requirement to deliver a balance of housing types to meet all needs. Instead, the exact housing mix has been moved to the supporting text, to provide a guide for developers and to highlight Peterborough's overall need.
- The affordable housing requirement has been lowered from 35% to a 30% target. This is based on the results of the Affordable Housing Financial

Viability Assessment, which clearly shows that residential development would not be viable if 35% of the dwellings were required to be affordable ones.

- No change has been made to the 70% - 30% split but the wording has been amended to state that it is a target and not a requirement.
- The supporting text has been re-written to include an explanation for the proposed housing mix and also to include further evidence and justification from the Affordable Housing Financial Viability Assessment.

Policy CS7 Gypsies and Travellers

Comments on Preferred Options Version

17 representations in total - 3 in support, 6 objections and 8 making general comments or suggesting a change

Main Issues Raised

Urban extensions shouldn't be required to provide additional pitches. All sites should be treated in the same manner, especially those in the countryside, and all applicants, including gypsies and travellers, should be treated in the same manner. The 'historic' environment should be afforded the same level of protection as the natural and built environments. There was support for the inclusion of sites as part of urban extensions from GO East and EERA, and a request to clarify which DPD Gypsy and Traveller Site Allocations would appear in.

Recommendations from Sustainability Appraisal

'Criterion (c) of the proposed policy should include a requirement that the site offers safe and convenient access to sustainable transport modes serving local services and community facilities such as footpaths, bridleways, cycle paths or regular public transport.'

'The proposed policy should not preclude more sustainable forms of water management being pursued (Criterion (d)), including water harvesting, grey water recycling and sustainable drainage and treatment, for example as part of a wider approach and network of such measures incorporated in development in which gypsy and traveller sites will be located.'

The proposals suggested (above) are not central to the sustainability and viability of gypsy and traveller site provision, and could have the effect of considerably reducing the range of potentially available sites. The forthcoming Planning Policies DPD would be a more appropriate document in which to suggest that "preference will be given to sites demonstrating a safe and convenient access to sustainable modes of transport" and that "site design that demonstrates a commitment to sustainable forms of water management will be favoured".

Enforced provision of access could hamper the likelihood of providing any sites.

Recommended Changes to the Core Strategy

- Strengthen the guarantee of site provision at the proposed urban extensions of Norwood and Great Haddon (with the figure of at least 15 pitches at each of these locations moved from policy CS3 into this policy).
- Granting permission in the countryside for "small buildings for appropriate associated business use" has been removed in line with paragraph 56 of ODPM Circular 01/06 Planning for Gypsy and Traveller Caravan Sites.
- Quantify the maximum number of transit pitches to be provided in the plan period (up to 15)
- Amend the introductory text to refer to the final outcome of the Single Issue Review of the RSS

Policy CS8 Regeneration

Comments on Preferred Options Version

18 representations in total - 3 in support and 15 objections/suggesting change

Main Issues Raised

- Neighbourhood Investment Areas favour urban areas to the detriment of the smaller rural areas.
- Concerns over how money will be invested.
- Concerns that proposed high density residential development may lead to social and community issues.
- Lack of emphasis on rural regeneration.
- Investment may be spread too thinly leading to some areas missing out.
- How to target funding within areas in most need.
- Lawfulness of planning obligations strategy is questioned.

Recommendations from Sustainability Appraisal

- There are areas with relatively high levels of multiple deprivation that are in flood risk areas (e.g. parts of Stanground Central ward). This policy should seek to address vulnerability to flooding through regeneration by preferentially targeting areas of deprivation with development that reduces existing flood risk.
- Some areas of high multiple deprivation (e.g. in east Ward) are adjacent to the highest quality agricultural land (Grade 1 or 2). The preferred option states that higher density development will be permitted around District Centres and it should state that such development will avoid the most productive land. Policies CS1 and CS8 do not restrict development for regeneration to District Centres. PPS7 para 28 requires the presence of best and most versatile land to be taken into account but para 29 requires Development Plans to identify any major areas of agricultural land planned for development and states that LDDs may wish to include policies to protect specific areas of such land from development.
- In seeking to address fuel poverty there is potential for the regeneration policy to promote renewable energy sources and energy-efficient development. The recommendation highlights the potential to preferentially target resource efficiency measures to homes likely to be subject to fuel poverty. Do not agree that reference to inequalities in health covers the point clearly.

Recommended Changes to the Core Strategy

- Amend to make reference to Neighbourhood Management Areas.
- Insert text to refer to measures of multiple deprivation; open space; and insert reference to ensure that the spread of investment shall not risk diluting the benefits received by those neighbourhoods in most need.
- Reword policy as follows: "Contributions to community infrastructure which are secured from developments of a size that when combined may have a cumulative impact on neighbourhoods, will be amalgamated into a separate

pool for each of the Neighbourhood Management Areas, and used to deliver benefits within the pool area from which the contribution is derived."

- Add reference that regeneration measures are also proposed for the City Centre, by policy CS14, through business, leisure and tourism development.

Policy CS9 Resource Efficiency

Comments on Preferred Options Version

38 representations in total - 7 in support and 31 objections/suggesting change

Main Issues Raised

- Part of the policy is not in conformity with national policy and we are not aware of any evidence to support the approach proposed.
- Potential risk to housing delivery and employment delivery. Need to strike balance between sustainability and delivery of growth.
- If the Council wishes to bring forward the national timetable then evidence must be presented which demonstrates there is no impact on the viability and deliverability of development.
- Disagree with blanket policy.
- Evidence required showing whether the BREEAM standard 'Excellent' is achievable or realistic. It is crucial that the Council allows some flexibility to ensure that it does not represent an unreasonable burden on companies which could jeopardise investment regeneration and employment creation in the City.
- Policy should incorporate an element of flexibility to allow for circumstances where it will not be viable or suitable to incorporate renewable energy equipment to reduce CO2 emissions by a given percentage.
- Peterborough's aspiration to become the environmental capital of the UK is commendable albeit it should not be at the detriment of creating viable and hence deliverable schemes.
- New development in Peterborough should seek to address issues of resource and energy efficiency and reduce carbon emissions.
- Should set date for BREEAM excellent rating.
- Support for inclusion of a resource efficiency policy.
- Policy needs to set more challenging targets.
- Water efficiency should be included in upper case policy.
- The overall objective of seeking to ensure greater energy efficiency is supported. Nevertheless this preferred option is difficult to understand and should be presented in a clearer form perhaps as a strategic policy with the detail contained in explanatory text or explained in supplementary planning guidance which can be updated to reflect changing circumstances.
- Overly detailed for a Core Strategy policy. Much of the detail should be reserved for the Council's Development Control DPD.
- It must be recognised that if carbon emissions are to be properly tackled then there needs to be a concerted effort to reduce carbon emissions from the existing housing stock which is far less environmentally friendly than any modern housing now being built.
- Policy CS 9 should be deleted and replaced with a general policy that aims to secure resource and energy efficiency. The detail should then be set out in SPD.

Recommendations from Sustainability Appraisal

The proposed policy for Resource Efficiency is aspirational, encouraging high levels of resource efficiency in new homes ahead of the Government timetable for attainment of Code for Sustainable Homes Levels as well as the top level of BREEAM award for non-residential buildings. In addition, targets are set for the

provision of energy from on-site or decentralised offsite renewable sources. Whilst these energy efficiency and renewable generation targets are to be applauded since the environmental benefits of achieving them would be substantial, there is also a risk that they will slow the delivery of the volume of new homes and workplaces set out in the emerging Core Strategy. This risk is offset to some extent by applying the accelerated efficiency timetable and renewable generation targets only to larger developments which will be better able to benefit from economies of scale in implementing these environmental technologies.

Recommended Changes to the Core Strategy

The Resource efficiency policy has been removed and replaced with a policy that deals specifically with the Sustainable Community Strategy ambition that Peterborough should become the Environment Capital of the UK. The Preferred Options document suggested a policy to secure improved sustainability standards (in terms of thermal efficiency, water efficiency, use of renewable energy etc) for residential and non-residential buildings in advance of national timelines. A study into the effects of such a policy on the viability of development shows that it would only be viable if the Council reduced its requirements in terms of planning obligations, or reduced its affordable housing requirements still further. In view of this, and the criticism of the preferred options draft policy (including from the Government Office), the Proposed Submission version replaces it with a less prescriptive policy, setting out the principles behind Peterborough's aspirations to become the UK's Environment Capital. This will fit well with the vision of the Sustainable Community Strategy.

Policy CS10 Renewable Energy

Comments on Preferred Options Version

20 representations in total - 6 in support and 14 objections/suggesting change

Main Issues Raised

- It is not appropriate to designate an area of search without a detailed understanding of the opportunities and constraints of the entire Unitary Authority Area.
- Need to emphasize the importance of reducing energy demand and maximising efficiency before considering renewable and low-carbon sources.
- Need to ensure impacts on air traffic operations and radar are properly considered and addressed.
- Need to undertake a proper study into the impacts of wind turbines on things such as Cathedral views and views of the countryside.

Recommendations from Sustainability Appraisal

1) State in supporting text that detailed matters relating to renewable energy development will be addressed in a subsequent DPD, including the PPS22 requirement to clearly set out 'which particular types and sizes of renewable energy developments will be acceptable in nationally designated areas' and examples of the types of renewable technologies appropriate at different scales of development.

2) Clarify the meaning of the second sentence of the penultimate paragraph of the policy. If '*comprehensive assessment*' refers to EIA, this should be explicit.

In response to SA recommendation (1) we acknowledge there may be scope for additional detailed studies at the local level could be addressed in a subsequent DPD or SPD. Explicit reference to it in the Core Strategy is not considered necessary.

In response to recommendation (2) we have replaced '*comprehensive assessment*' with '*Environmental Impact Assessment*'

Recommended Changes to the Core Strategy

- Remove reference to 'area of search'.
- Add additional text to refer to hierarchy of energy demand reduction, energy efficiency and renewable energy.
- Ensure appropriate reference is made to protection of aviation (RAF) operations.
- Replace the reference to 'comprehensive assessment' with a reference to 'Environmental Impact Assessment'

Policy CS11 Developer Contributions to Infrastructure Provision

Comments on Preferred Options Version

36 representations in total - 8 in support and 28 objections/suggesting change

Main Issues Raised

- A standard charge or tariff approach to developer contributions is welcomed where this promotes the transparent negotiation of contributions that relate to the scale and type of development proposed.
- There should be some link either direct or indirect between contributions made and additional infrastructure required. Peterborough Council has sensibly recognised the importance of viability in looking at, for example, percentages for affordable housing. The degree of contribution it will be feasible to obtain from a developer will also vary dependent upon market forces and viability.
- The CS should make clear that before developer contributions can be implemented a SPD will be prepared which will set out clearly the infrastructure that will be necessary, when it will be required, from where contributions are likely to be drawn, the scales of contribution and the mechanism by which the infrastructure will be delivered.
- Due to the current lack of clarity regarding the level of contribution to infrastructure provision required, it can cause not only unnecessary delays to the agreement of the planning permission due to the length of time it can take to negotiate the contribution for a site but also make schemes for affordable housing unviable financially if the tariff is set too high.
- The Council's approach to address contributions is based upon a standard charge for different types of development and whilst it does provide an element of certainty to developers, it does not allow for individual site requirements and circumstances to be taken into consideration.
- Some large developments have significant amounts of new infrastructure embedded into the proposals which provides benefits over and above those required to mitigate the impacts of the scheme itself. In these circumstances there must be flexibility to offset this against any standard tariff and this needs to be made clear in the policy itself.
- Acknowledgement of the advantages of certainty for the developer in a standard charge or tariff approach when seeking to secure planning obligations to secure site-specific provision.
- Concerns about the idea of allowing Section 106 money to be distributed around the villages with no regard to the neighbourhoods inconvenienced by new building.
- Need to strike the right balance between high enough levels of contributions to fund the necessary infrastructure and not being so high as to deter investment in the first place.

Recommendations from Sustainability Appraisal

The supporting text should state that mechanisms for the ongoing management and maintenance of infrastructure provided through developer contributions will be contained in other LDDs such as a Planning Obligations SPD.

The supporting text should state that a mechanism to guarantee developer funded infrastructure expenditure is made in an efficient manner and monitored accordingly will be contained in other LDDs such as a Planning Obligations SPD.

Recommended Changes to the Core Strategy

The policy and supporting text has been substantially re-drafted to take into account the newly drafted Infrastructure policy and all of the representations received, whilst maintaining the basic principles of a standard charge approach, combined with pooling of contributions. Examples of contributions for each tier have been removed from the policy itself and included in the explanatory text.

Policy CS12 Transport

Comments on Preferred Options Version

27 representations in total - 8 in support and 19 objections/suggesting change

Main Issues Raised

- The policy does not reflect transport priorities for Peterborough, does not accord with the Regional Plan or the Environment Capital Manifesto.
- The policy fails to set out solutions that provide truly sustainable options.
- The policy fails to draw out key transport infrastructure requirements.
- The policy should place more emphasis on sustainable transport modes in line with the Environment Capital aspirations.
- Alternative sustainable transport options are not assessed or proposed as part of the policy.
- Car parking strategies need to be reviewed.

Recommendations from Sustainability Appraisal

- 1) Priority to walking, cycling and public transport should be made explicit.
- 2) There is a need to clarify the mechanisms for delivering this policy. (*PCC Planning Policy responded to this recommendation stating: 'It is felt that LTP2 is clearly identified as the key delivery mechanism for this policy'*). Retain recommendation – identify LTP2 as the key delivery mechanism *within the text of policy CS12*.
- 3) Policy option A states that Park and Ride facilities will be provided. These may not be the most sustainable option and may encourage car use and have considerable land take/landscape impacts. Better public transport provision to surrounding communities as an alternative to Park and Ride schemes could be considered (*PCC Planning Policy responded to this recommendation pointing out that Park and Ride was used as an example rather than being prescriptive*). Although it is not prescriptive, including reference to Park and Ride facilities implies that these will be supported; the recommendation remains.
- 4) The options of congestion charging/road pricing/car clubs/car-free development are not considered at all in the proposed transport policy. These should be investigated in line with Peterborough's ambition to be known as the Environment Capital of the UK (e.g. the City Centre policy 'Introduction and Issues' states that "compared with other city centres, it is relatively accessible by private car". Therefore to encourage people to use other modes will require a major shift in emphasis and provision). (*PCC Planning Policy responded to this recommendation pointing out that these options are addressed as part of the LTP2. As a separate policy document which meets statutory requirements it is really the LTP2 and not the Core Strategy which is the key mechanism for options appraisal and delivery*). Acknowledge PCC response, but since the generation of traffic is such a significant sustainability issue, the recommendation remains. This policy deals with transport and notwithstanding LTP2, should set the framework for a more radical approach to achieve behavioural change.

In response to SA recommended amendment 1 we have made explicit reference to journeys on foot, cycle, public transport, car share and water.

In response to recommendation 2 we have explicitly referred to the Local Transport Plan (LTP) and Long Term Transport Strategy in the policy wording.

In response to recommendations 3 and 4 PCC Planning Policy does not feel it is able to assess alternative transport options or indeed list which options are up for consideration. This process is very much the remit of Transport Planning and its LTP3 and the Long Term Transport Strategy (LTTTS) who are working to very different timescales to us. We have, however, worked closely with Transport colleagues to ensure the policy reflects what is coming through the LTTTS as much as possible.

Recommended Changes to the Core Strategy

- Explicit reference to our Environment Capital aspirations has been made.
- The LTP has been explicitly identified as the key delivery mechanism for this policy.
- Explicit reference has been made to increasing modal shift to sustainable modes of travel.
- A commitment to review current car parking strategies has been made.
- Reference to lead agencies and delivery bodies has been made explicit in the supporting text.
- Latest proposed changes and updated policy recommendations from Transport colleagues have been incorporated into the policy.

Policy CS13 Retail

Comments on Preferred Options Version

25 representations in total - 9 in support and 16 objections/suggesting change

Main Issues Raised

The East of England Regional Assembly supported this policy as it was in general conformity with the East of England Plan. There was also support from Go-East subject to minor changes, including cross reference to policy CS8 (Regeneration) in the explanatory text.

GVA Grimley were appointed to carry out a retail study for Peterborough to calculate and update forecasts for retail floorspace capacity over the plan period, based on recent household surveys and trends. The Core Strategy retail floorspace figures will be updated based on the GVA Grimley report published in 2009.

A number of respondents requested further guidance on the type of retail centres that should be provided in the urban extensions. The policy will be amended to accommodate their request, although not suggesting whether these should be local or district centres at this stage. We also accepted that new convenience floorspace created in the city centre should be located in/near new major residential development, a view expressed by a few respondents. This change will be included in the policy.

Recommendations from Sustainability Appraisal

'For clarity, state in supporting text that there is no policy relationship between the retail hierarchy and the settlement hierarchy'.

We have included the Sustainability Appraisal recommendation in the supporting text as suggested.

Recommended Changes to the Core Strategy

- Update policy CS13 and paragraph 6.10.4 to include figures from the Peterborough Retail Study 2009
- Include a cross-reference to policy CS8 (Regeneration) in the explanatory text
- Amend the second paragraph of policy CS13 to read as follows; "New centres will be created at Hampton, Stanground South, Paston Reserve/Norwood and Great Haddon, with the scale of new retail floorspace appropriate for the catchment area that the centre will serve."
- Amend the 6th paragraph of policy CS13 to read as follows: "...Werrington Centre, the City Centre (of appropriate scale to serve areas of major new residential development) and at...."

Policy CS14 City Centre

Comments on Preferred Options Version

30 representations in total - 11 in support and 19 objections/suggesting change

Main Issues Raised

The East of England Regional Assembly supported this policy as it was in general conformity with the East of England Plan. There was also support from the East of England Development Agency but Go-East did not comment on this policy, and so presumably they are happy with it as drafted.

An agent acting on behalf of Queensgate Limited Partnership suggested that the policy seems to indicate that improvements to the Bridge Street area are in response to development in North Westgate. This does not reflect the positive impact of North Westgate development on the city centre. The policy has been amended to state that improvements and appropriate development in the Bridge Street area will be encouraged as part of a phased strategy to complement development in the North Westgate area.

A number of respondents were concerned about “an average net density of 100 dwellings per hectare” included in the policy for all new residential development. Their concerns were that this would result in a high proportion flats in the city centre and this would not promote family living and could potentially lead to unacceptably high buildings and oversupply of apartments. The policy has been changed to avoid specific reference to the 100 dwellings per hectare figure, to alleviate their concerns.

The city centre boundary will be changed through the City Centre Area Action Plan. Because of the change, some of the sites that were counted in the urban area are now counted as being the city centre boundary instead. This change has increased the number of new dwellings planned for the city centre from 3,900 to 4,300.

The Peterborough Civic Society suggested changes to the policy as it seems to give the impression that the conservation area can only be enhanced through new development. The policy has been amended to overcome this and that all buildings in the conservation area contribute to its character; not just the listed buildings.

In response to the representation from the Environment Agency, references to the natural environment and river based navigation have been added to the 6th paragraph of the policy. References to objective OB28 (which is now OB29, Flood risk) and OB16 (Walking and cycling) along with new objective OB24 (River Nene) will be added to the explanatory text.

Recommendations from Sustainability Appraisal

The proposed policy for The City Centre is expected to have mixed sustainability effects. Positive effects are generally expected in relation to the economy, and regeneration of the City Centre is expected to have a number of social benefits e.g. through the provision of additional services and facilities. However, significant development in the City Centre has the potential to have adverse environmental impacts through increased emissions, the potential to exacerbate flooding and potential loss or damage to biodiversity.

Recommended Changes to the Core Strategy

- Amend the last sentence in 2nd paragraph of policy CS14 to read:
“Improvements and appropriate development in the Bridge Street area will be encouraged as part of a phased strategy to complement development in the North Westgate area.”
- Rewrite the first sentence of the 4th paragraph in policy CS14 to read as follows: “The city centre will be promoted as a location for substantial new residential development at a range of densities according to location, delivering in the order of 4,300 additional dwellings.”
- Amend the first part of the penultimate paragraph in policy CS14 to read as follows: “Improvements to the public realm throughout the city centre will be promoted, with a particular focus on the pedestrian environment and connections between the railway station, bus station and Cathedral Square”
- Final paragraph of policy CS14 to be amended to read as follows; “The city centre’s historic environment will be protected, including through the requirement that any new development should be of a scale, character, quality of design and standard of finish that will preserve and enhance its character and appearance.”
- Add reference to natural environment and river based navigation to 6th paragraph in policy CS14.
- Include reference to objective OB28 (which is now OB29) and OB16, and new objective OB24 (River Nene) to the explanatory text.
- Add guidance to the explanatory text to indicate that the density of new residential development will depend on a number of factors including location, design, site shape and constraints, relation to adjoining buildings etc. Therefore, a range of densities will be permitted in the city centre, taking these factors into account.

Policy CS15 Urban Design

Comments on Preferred Options Version

16 representations in total - 8 in support and 8 objections/suggesting change

Main Issues Raised and Recommended Changes to the Core Strategy

- The policy omits reference to cycling which is an important mode that has to be encouraged and needs to be referred to. We have amended the fourth bullet point to include reference to cycling.
- Street lighting can have detrimental effects on wildlife. Natural England recommends that the second bullet point includes a reference to the protection of biodiversity. We have amended the second bullet point to read ...landscaping which is appropriate for their location *and which does not have a negative impact on biodiversity*'.
- The Civic Society raises the issue of whether there should be a detailed policy about building heights. This is a matter for the forthcoming Planning Policies DPD. It is the aim of this policy to not be too prescriptive in its requirements and to set out basic design principles, but there is a commitment in the explanatory text to the production of additional guidance.
- The Civic Society suggest that a second bullet point be included to say: "New development should respect the settings of listed buildings and buildings contributing positively to the character of conservation areas." However, there is a separate policy that deals with protecting the settings of listed buildings and buildings that contribute positively to the character conservation areas. No change is proposed.
- English Heritage supports the emphasis of this proposed policy, although they feel that more work is needed to define what is meant by "local distinctiveness". These comments are welcomed. However, evidence of what is 'locally distinctive' about Peterborough comes from sources such as the Landscape Character Assessment, the Peterborough Green Grid Strategy, the Cambridgeshire and Peterborough Biodiversity Action Plans, the County Wildlife Sites records, the Peterborough City Council sites and Monuments record, Conservation Area Appraisals, Village Design Statements, the Peterborough Public Realm Strategy and the Cathedral Precincts Archaeological Survey. Further work is not necessary for the Core Strategy, bearing in mind the advice in PPS12 (paragraph 4.37) that 'evidence gathered should be proportionate to the job being undertaken in the plan'. No change is proposed.

Recommendations from Sustainability Appraisal

- The policy wording required all new development to be accessible by all modes of transport. The SA concluded that this would preclude the option of car-free developments, which may be appropriate for city centre sites or other sites easily accessible by more sustainable modes. The policy wording was amended to delete reference to "all modes" of transport, and to refer to "potential" users and "range of modes", instead. LUC are satisfied that the

recommendation was adopted, although their preference for more sustainable modes remains. However, officers feel that the reference to a range of modes of transport covers sustainable transport and is therefore sufficient. No further changes made.

Policy CS16 The Historic Built Environment

Comments on Preferred Options Version

9 representations in total - 5 in support and 4 objections/suggesting change

Recommendations from Sustainability Appraisal

'Policy wording could be considered to repeat national guidance (i.e. in relation to the protection of listed buildings, conservation areas etc). Although this provides a useful context, it is not necessary to repeat national guidance and it is recommended that the policy focuses on aspects of the historic environment which are regionally and locally distinctive. The first part of the policy which could be considered to repeat national guidance could be included as supporting text to the policy.'

It was decided to retain the first part of the policy because it is considered that it does the minimum necessary to highlight the need to protect and enhance listed buildings and conservation areas without going into the detail of national policy. The second part does focus more on locally distinctive character and issues at a level of detail which is appropriate for a core strategy. English Heritage support the overall wording of the policy and feel that the first paragraph is necessary to provide a strategic overview of the Council's approach to the management of the historic environment.

Main Issues Raised and Recommended Changes to the Core Strategy

- Delete the word 'built' from the title of this policy as the historic environment includes more than just the built environment; it involves elements such as buried archaeology, rural landscapes and historic parks and gardens.
- Include reference to historic features in the first paragraph of the policy.
- Insert reference to the Council's commitment to producing supplementary guidance on cathedral views in the supporting text.

Policy CS17 Culture, Leisure and Tourism

Comments on Preferred Options Version

22 representations in total - 13 in support and 9 objections/suggesting a change

Recommendations from Sustainability Appraisal

- The SA requires that we provide more specific information on how the additional visitors to Peterborough expected as a result of this policy will be encouraged to use public transport rather than driving to reach the city. However, this could be through marketing and the tourism strategy and would not be appropriate for inclusion in a succinct strategy document.
- The SA states that in the absence of further detail, the deliverability of the objective to 'encourage use of different transport modes' is questionable and therefore the recommendation remains. The changes suggested by Sustrans have been incorporated. Three of the bullet points in policy CS17 will be amended to improve references to sustainable transport.
- The Preferred Option was revised to provide clearer justification, explanation and guidance where the policy was seen to lack certainty or clarity (the sequential approach; the relocation of the football ground; links to the university; how existing assets/ features will help guide development etc.). The reference to the relocation of the football ground has been removed. Including the requirements of the sequential approach would result in repeat of national guidance, so no change has been made. The SA concludes that the revised policy wording is clearer and the removal of the unexplained reference to the football ground is welcomed. However, there are still remaining areas that lack certainty or clarity relating to links to the university; and how existing assets/ features will help guide development.

Main Issues Raised and Recommended Changes to the Core Strategy

- Amend paragraph 6.14.4 to accurately reflect the number of theatres in Peterborough, in accordance with a representation made (and as a result of the closure of the Broadway Theatre).
- Amend the final paragraph of the policy text to clarify 'appropriate alternative' in accordance with comments made by some respondents. Amend the last paragraph of the policy text as follows: ...Planning permission will only be granted for a scheme which would result in the loss of an existing cultural, leisure or tourism facility if it can be demonstrated that the use is no longer viable, or an appropriate alternative is to be provided, which is at least equivalent to that lost in terms of quantity and quality and is in a sustainable location to best meet the needs of users.
- Add reference to the promotion of a publicly accessible water transport option that could link the city centre to Flag Fen, Nene Valley Railway, Ferry Meadows, amongst others as suggested by the Environment Agency.
- Make reference in the supporting text (paragraphs 6.14.6 and 6.14.14) to the forthcoming City Centre Area Action Plan, which will provide more detail on the location and type of culture, leisure and tourism facilities proposed for the

city centre, in response to the comments made by Government Office for the East of England.

- Make changes to three of the bullet points (2nd, 8th and 12th) in the policy to improve reference to sustainable transport.
- Amend paragraph 6.14.7 to refer to larger scale sports facilities that have a substantial land-take, in response to comments made.

Policy CS18 Open Space and Green Infrastructure

Comments on Preferred Options Version

30 representations in total – 18 in support and 12 objections/suggesting change

Recommendations from Sustainability Appraisal

Land Use Consultants have made no recommendations in the Sustainability Appraisal. They conclude that the Preferred Option provides for an increase in the overall land area for open spaces, including green infrastructure. This policy supports the development of the Green Grid and will protect existing open spaces.

Main Issues Raised and Recommended Changes to the Core Strategy

- Insert the following sentence in the supporting text accordance with the Habitats Regulations Assessment – *‘the policy has been written to ensure that there is no adverse effect on the integrity of International and European sites as a result of additional recreational pressure by requiring the provision of new open space of sufficient size and quality from all new residential development’*; and the following in the policy text - Where a new development has the potential to have an adverse effect on the integrity of an International or European site as a result of additional recreational pressure, the development will be required to provide open space of sufficient size and quality to accommodate that pressure.
- There was a request that reference be made to the limestone plateau in the list of Green Grid features to be enhanced. This area is regionally important and forms a major sub-regional link to the Rockingham Forest in Northants: Insert the following bullet point under the key features of the green grid strategy: *“the promotion of the Nassaburgh limestone character area as a sub-regional corridor for biodiversity and landscape retention, restoration and creation”*
- Sport England are concerned that this policy and explanatory text does not specify the types of open space that are included in the policy. They suggest that paragraph 6.15.1 should be explicit in defining the types of open space covered by this policy. Proposed change: Amend the first paragraph of the policy text to refer to sport and play as follows: Peterborough and its villages will be provided with a range of all types of open space and green infrastructure that deliver places for recreation, sport and play as well as delivering benefits for biodiversity

Amend paragraph 6.15.1 as follows:

Peterborough is a place with large areas of attractive open spaces and green infrastructure that deliver places for recreation, sport and play as well as delivering benefits for biodiversity. Green Infrastructure is the sub-regional network of protected sites, nature reserves, green spaces, waterways and greenway linkages.

- There is concern that this policy is a direct threat to the open space in Orton Waterville. However, officers are satisfied that the policy protects existing open space, particularly the final paragraph. The forthcoming Planning

Policies Development Plan Document will deal with the protection of open space for recreation in more detail.

- There was a request for the protection of ancient woodland. This is more appropriate to be addressed in the Biodiversity policy (CS 20).
- In response to a comment from the Environment Agency, we have amended the first bullet point to make reference to the creation and promotion of access, navigation and recreation on the River Nene and Welland. Paragraph 16.15.4 is amended to 'The proposals and action plan of the Green Grid Strategy will need to be taken into account *and, where possible*, supported in new developments to ensure that the required open space is provided to support the growth of the City.
- In response to a comment, reference has been added to open space for sport and play.
- Go East - suggest that we include any known strategic sites for open space. In accordance with policy CS3 urban extensions at Norwood and Great Haddon will provide a network of open spaces for play, sport and recreation including nature reserves and green spaces that will contribute to the Peterborough Green Grid. Amend the final bullet point of the policy as follows: *'the provision of strategically significant green spaces in association with areas of development proposed in this Core Strategy around the edge of the existing urban area of the City, including in particular, at Great Haddon and Norwood'*.
- It was suggested that it would be appropriate to refer to publicly accessible open space in the opening paragraph, and this has been done.
- The fifth paragraph has been re-worded to include reference to partnership working to achieve green infrastructure.

Policy CS19 Landscape Character

Comments on Preferred Options Version

15 representations in total - 8 in support and 7 objections/suggesting change

Main Issues Raised

There was widespread support for the policy, from consultees including EERA, English Heritage and Natural England, which praised the methodology used to determine the policy, the complementary nature of policies throughout the Core Strategy and the application of national guidance in a local context.

Recommendations from Sustainability Appraisal

'Criterion (c): reword as 'Protect and where possible enhance...'

'Criterion (h): provide greater clarity on what this means and how it will be implemented, either in the policy itself or the supporting text. The intention of the policy is to prevent development that would damage landscape character and it is not clear how mitigation might resolve such issues.'

The Core Strategy has been amended to ensure that Landscape Character Areas are actually displayed on the Key Diagram, and the criteria that will need to be satisfied in order for development to be approved have also been amended, and combined, to improve clarity; the submission version criteria do however retain the values enshrined in the earlier version and present them in a more appropriate way without detracting from the recommendations of the Sustainability Appraisal.

Recommended Changes to the Core Strategy

Preferred Options criteria	Submission Version criteria
(a) protect and, where possible, enhance the character and quality of the landscape in which it would be situated;	(a) recognise and, where possible, enhance the character and qualities of the local landscape through appropriate design and management;
(b) preserve and promote local distinctiveness and diversity;	(b) reflect and enhance local distinctiveness and diversity;
(c) protect and, where possible, enhance local character through appropriate design and management;	(c) make adequate provision as far as is reasonably practicable for the retention of features and habitats of significant landscape, historic, wildlife and geological importance;
(d) avoid the loss of features or habitats of significant landscape, historic, wildlife or geological importance;	(d) safeguard and where possible incorporate and enhance important views within the development layout;
(e) safeguard, and where possible enhance important views;	(e) protect the landscape settings and separate identities of settlements; and
(f) promote effective landscape management measures;	(f) provide appropriate landscape mitigation proportionate in scale and design, and/or suitable off-site enhancements.
(g) protect the landscape settings and separate identities of settlements;	
(h) provide suitable mitigation to restore any damaged landscapes and features in poor condition; and	
(i) provide mitigation proportionate in scale to the proposed development and/or suitable off-site enhancements.	

Policy CS20 Biodiversity and Geological Conservation

Comments on Preferred Options Version

13 representations in total - 7 in support and 6 objections/suggesting change

Main Issues Raised

There was widespread support for the policy from consultees including Natural England and The Wildlife Trust. Amendments suggested from various consultees to ensure greater prominence is given to issues of access have been taken on-board, as has the statutory requirement from PPS9 not to include specific policies for protected species in local development documents.

Recommendations from Sustainability Appraisal

'The policy wording for the preferred option should make clear what is meant by "demonstrable reasons which outweigh the need to safeguard the nature/geological conservation of the site". Examples of such reasons, or development control criteria should be included in this policy, and the need to consider alternative locations that would not have adverse effects on any LNR, CWS or RIGS.'

The policy has been amended to expand on "demonstrable reasons" by referring to development that would be in accordance with the Sustainable Community Strategy priorities.

Recommended Changes to the Core Strategy

- Incorporate a cross-reference to the accessibility of additional LNRs into the supporting text to policy CS18.
- Include recognised ancient woodlands as one of the features to be protected.
- Separate the second paragraph of the policy into one paragraph dealing with statutory protection for international sites; and another paragraph dealing with national and local sites. This latter one to begin: "Planning permission will only be granted for development which would have an adverse effect on any SSSI, LNR, CWS or RIGS if no alternative sites are available and if there are demonstrable reasons for the proposed development (in accordance with the priorities of the Sustainable Community Strategy) which outweigh the need to safeguard the nature/geological conservation value of the site;"
- Revise bullet point three to read "avoid demonstrable harm to habitats or species which are of importance to biodiversity. However, where there is an overriding need for development which would have an adverse impact on such habitats or species, the Council will require appropriate mitigation and/or compensatory measures to ensure a net gain for biodiversity."

Policy CS21 Floodrisk

Comments on Preferred Options Version

13 representations in total - 4 in support, 1 objection and 8 making general comments or suggesting changes

Main Issues Raised

Phasing outside the urban area should be constrained by water and sewerage capacity. Residential development in floodzone 3a should be permitted subject to the sequential test as well as on previously developed land. Innovative design solutions should not preclude development in the flood risk areas. Raising awareness that any development on the floodplain may increase floodrisk elsewhere. Flooding is not a strategic issue. The HBF raised concerns regarding the implementation of SUDS where appropriate and feasible. EERA, Natural England and the Environment Agency support the requirement for appropriate development to incorporate SUDS. Development should be considered in floodzone 1 first. Not enough spatial scales are addressed. The policy may unintentionally favour residential development in flood zones 2 and 3a. Less vulnerable development should be subjected to the exception test.

All recommendations from Sustainability Appraisal have been adopted and therefore removed.

Recommended Changes to the Core Strategy

- Incorporate a reference to the Level 2 SFRA in the first paragraph, as a factor in allocating developments and for the granting or refusal of planning permission.
- In-line with PCC's Environment Capital aspirations and the environmental factors affecting flooding around Peterborough, introduce a clear expression of the need for development that satisfies PPS25 to demonstrate flood risk avoidance measures and a reduction in overall floodrisk as follows;
“Development in flood zones 2 and 3 will only be permitted following the successful completion of a sequential test, exception test if necessary, suitable demonstration of meeting identified need, and through the submission of a Site Specific Flood Risk Assessment demonstrating appropriate flood risk management measures and a positive approach to reducing flood risk overall.”
- To ensure appropriate implementation of SUDS, awareness will be raised of the impact of SUDS in relation to the catchment it will serve, in the penultimate paragraph.
- The background information has been revised to provide additional clarity and justification for the policy stance.
- The phrase ‘Rapid Inundation Zone’ has been explained in the Glossary of terms.

Chapter 7 - Monitoring

Comments on Preferred Options Version

9 representations in total - 1 in support, 1 objection and 7 suggesting changes or making general comments

Main Issues Raised

The relationship between implementation and monitoring was stressed, with the suggestion that the Implementation Chapter should come before the Monitoring Chapter. In addition, monitoring should be more focussed on identifying the points at which some intervention would become necessary if the overall strategy was at risk of not being delivered as planned.

There were specific comments about some of the indicators relating to the housing trajectory, the availability of five years' housing land supply, affordable housing, employment land, county wildlife sites, biodiversity, renewable energy, design and listed buildings.

Recommendations from Sustainability Appraisal

The SA report made a considerable number of suggestions for monitoring indicators, with the emphasis, where possible, on measuring outcomes rather than outputs. It emphasised that monitoring the sustainability effects of implementing the Core Strategy should be conducted as part of an overall approach to monitoring the DPDs and SPDs that make up the overall LDF.

Proposed Changes to the Core Strategy

- Combine the Monitoring and Implementation chapters into a single Implementation and Monitoring chapter, with a greater emphasis on monitoring how the strategy is being implemented and at what point some intervention is necessary.
- Include a table which explains how the bar chart housing trajectory is made up from different categories of housing development.
- Amend the policy CS20 indicator for county wildlife sites to measure their area as well as their number.
- Include an indicator for policy CS2 relating to the take-up of employment land by location and type.
- Include an indicator for policy CS6 relating to the delivery of affordable housing.
- Amend the policy CS16 indicator to measure changes to the number of entries for Peterborough on English Heritage's Buildings at Risk register.

Chapter 8 Implementation

Comments on Preferred Options Version

14 representations in total – 3 in support and 11 objections/suggesting a change

Main Issues Raised

There is a general consensus that the implementation section should include a greater level of detail. Comments, notably from the Government Office, suggested that the policy should include information on whom, how and when the Council's vision will be delivered.

Concerns were also raised that the Core Strategy was based upon a premise of strong economic performance. Since the consultation was completed we have seen the impact of the economic downturn. It is therefore important that the strategy includes an element of flexibility. To achieve this, the plan will contain trigger points that when identified through monitoring lead to identified contingencies being put in place.

Recommendations from Sustainability Appraisal

There are no recommendations from the Sustainability Appraisal

Proposed Changes to the Core Strategy

- Revise the structure and content of the Implementation chapter, with additional details, to comply with the requirements of PPS12 (2008) and the comments received in the consultation
- Refer to the Integrated Development Plan (IDP) which will provide an up to date, detailed information source for items of infrastructure to support the Core Strategy.

Appendices

Comments on Preferred Options Version

6 representations in total - 1 in support, 1 objection and 4 suggesting changes

There are 4 Appendices in the Core Strategy, covering the Alternative Options for the Spatial Strategy, the Alternative Economic Scenarios, Local Plan Policies to be Replaced by Core Strategy Policies, and a Glossary.

Main Issues Raised

Three comments related to the Alternative Options that were considered, expressing support for an option; and pointing out the absence of a map of the IGS preferred Spatial Option.

Three respondents wanted to see the retention of a green wedge policy for Glington, missing the point that (as the green wedge policy was absent from the list in the appendix) it was retained for the time being.

One comment sought a breakdown of the Use Classes Order in the Glossary.

Recommendations from Sustainability Appraisal

There are no recommendations from the Sustainability Appraisal relating to the Appendices.

Proposed Changes to the Core Strategy

- Delete Appendices 1 and 2 (relating to the Alternative Options for the Spatial Strategy and the Alternative Economic Scenarios) because these served a specific purpose in helping to understand the Preferred Options document for public consultation, but are not relevant for the submission version.
- Amend the Appendix relating to Local Plan policies to be saved, in the light of the 2008 Direction from the Secretary of State regarding saved policies. This involves deleting from the Appendix those policies that were not saved by the Direction.
- Add into the Glossary (i) a definition of each of the Use Classes that are actually referred to in the Core Strategy (but not the full Use Classes Order); (ii) a definition of the transport user hierarchy; (iii) a definition of rapid inundation zone; (iv) a definition of windfall site; (v) a definition of rapid inundation zone; (vi) a definition of the Infrastructure Planning Commission.

This page is intentionally left blank