

SUMMARY OF MAIN ISSUES RAISED IN COMMENTS ON THE PLANNING POLICIES DPD (CONSULTATION DRAFT) AND MAIN CHANGES MADE FOR THE SUBMISSION VERSION

- 1.1 The Planning Policies DPD (Consultation Draft) version was published for public consultation over a 6 week period in February and March 2011. There were 79 comments from 39 different consultees. The Council was required by Regulation 25 (5) of the 2008 Regulations and by its own SCI, to take these into account in preparing the version of the Planning Policies DPD to be submitted to the Secretary of State. This report presents – on a chapter-by-chapter and policy by policy basis - a summary of the main issues raised in comments and a summary of the main changes that were made to the Planning Policies DPD in order to make it appropriate for submission.
- 1.2 (References to policy and paragraph numbers are to those in the Planning Policies DPD (Consultation Draft) version; many of the policies and policy numbers have changed in the Submission version.)

Comments on the Planning Policies DPD (Consultation Draft) Version

Chapter 1 – Introduction and Background

There was only one representation to this section.

Main Issues Raised

- The policies are generally well laid out, clear to follow, and they take a logical approach.
- One of our significant areas of concern regarding the Planning Policies DPD is its need for policy guidance on water standards

Main Changes to the Planning Policies DPD

- We have made changes to policies PP13 and PP14 to include protection and where possible improvement to water to help enhance landscape and habitat.

Chapter 2 – Context

There was only one representation to this section.

Main Issues Raised

- We have no comments to make other than those made elsewhere in relation to specific policies.

Main Changes to the Planning Policies DPD

- No change proposed

Chapter 3 – Planning Policies

Most of the comments received were for this section. Comments relating to a specific policy are discussed under that policy.

Policy PP1 – Design Quality

There were three comments made on this policy.

Main Issues Raised

- Policy PP1 should be flexible to the needs of business when setting design criteria for industrial buildings.
- The detailed policies on the natural environment needs to be mentioned here so it is clear an application cannot go forward without considering the natural environment along with the built environment.
- We object to this policy as it is very vague in its terminology, particularly points (c) and (d) regarding sustainable construction principles.

Main Changes to the Planning Policies DPD

- We have included flexibility for industrial buildings and included consideration of natural environment in the policy. We have clarified our terminology in the supporting text and there is no need to change policy wording.

Policy PP2 – Impacts of New Development

There was only one comment made on this policy.

Main Issues Raised

- Policy PP2 needs to define unacceptable impact and include impact on green spaces and biodiversity.

Main Changes to the Planning Policies DPD

- We have amended the policy to include “loss of public open spaces” in the policy. Impact of development on biodiversity is included in policy PP13 (The Landscaping and Biodiversity Implications of Development) and so there is no need to repeat this in policy PP2.

Policy PP3 – Amenity Provision in New Development

There was only one comment made on this policy.

Main Issues Raised

- PP3 should include other amenities such as play areas for toddlers, bus stops, facilities for cyclists.

Main Changes to the Planning Policies DPD

- We have included “Residential” in the policy title to read “Amenity Provision in New Residential Development” for clarity. No changes made to policy as a result of this representation as play areas are included in the open space standards (PP11) and facilities for cyclist are included in the parking standards (PP12). Provisions of bus stops are beyond the scope of planning. However, significant changes have been made to this policy to take account of recent issues including internal floorspace and comments made by other officers.

Policy PP4 – Prestigious Homes

There were two comments made on this policy.

Main Issues Raised

- There may be a shortage of executive housing but so is there of affordable housing. For people in the villages it can be difficult to find accommodation nearby because of the small size of the villages.
- We broadly support the aim to prevent the loss of historic buildings or their conversion into alternative uses that are not sympathetic to their character and appearance

Main Changes to the Planning Policies DPD

- No change - this policy encourages the supply of top-of-the-market housing to help to attract business leaders to Peterborough. The Core Strategy policy CS8 (Meeting Housing Needs) provides guidance on affordable housing in all areas of Peterborough, including villages.

Policy PP5 – Conversion and Replacement Dwellings in the Countryside

There were two comments made on this policy.

Main Issues Raised

- There may be a shortage of executive housing but so is there of affordable housing. For people in the villages it can be difficult to find accommodation nearby because of the small size of the villages.
- We welcome the caveats to the historic environment within the policy, specifically points (d) and (g), which should be consistent with the relevant sections of PPS4 and PPS5.

Main Changes to the Planning Policies DPD

- No change, Policy is consistent with PPS4 and PPS5. Issue of affordable housing in the villages is discussed above in our response to policy PP4.

Policy PP6 – The Rural Economy

There was only one comment made on this policy.

Main Issues Raised

- Planning for development should take into consideration:- The rural economy - Benefits for village residents - Enjoyment of the Countryside for the wider community.

Main Changes to the Planning Policies DPD

- No change made to this policy. The policy provides positive incentive to the rural economy.

Policy PP7 – Primary Retail Frontages in District Centres

There were two comments made on this policy.

Main Issues Raised

- We do not object to the objective or wording of policy PP7. However, it appears from paragraph 3.7.1 and the maps in Appendix F that, in addition to the Primary Shop Frontages, it is under this policy and supporting text that the District Centre boundaries and the Primary Shopping Areas are also defined. We object to this approach, particularly as there is no reference in the policy or supporting text to the rationale or purpose of these other boundaries. We suggest a new policy should be inserted in the Planning Policies DPD which defines district centre boundaries and Primary Shopping Areas.
- The cycle parking standards, at Appendix A, in relation to Class A2 uses are considerably more exacting than those for Class A1 activities (whereas car parking standards are the same). We query why this should be and what evidence base was prepared to justify the higher requirement in relation to its type of use. We object to Policy PP7 as the Council has provided no evidence to justify its continued restriction of financial service retailers such as banks in primary frontages and has not given consideration to reasonable alternative strategies.

Main Changes to the Planning Policies DPD

- We have included a new policy (Development for retail and Leisure Uses) in the Proposed Submission draft version (policy PP7, and the current policy PP7 becomes policy PP8 in the submission version and subsequent policies increase their number by one). This policy defines District and Local Centre boundaries and Primary Shopping Areas and their purpose in locating retail and other centre uses.
- The cycle parking standards, at Appendix A, in relation to Class A2 (Financial and Professional Services) uses has been amended so that they are in line with A1 uses (general shops excluding food stores). No change made to policy PP7. This is now policy PP8 in the Proposed Submission version.

Policy PP8 – Shop Frontages, Security Shutters and Canopies

There was only one comment made on this policy.

Main Issues Raised

- We welcome the effort to safeguard buildings and townscapes from inappropriate shop fronts, security shutters and canopies. We understand that a supplementary planning document is being produced on shop front design, and we hope that this can be linked to this policy and provide detailed guidance on appropriate designs.

Main Changes to the Planning Policies DPD

- No change made to this policy. This is now policy PP9 in the Proposed Submission version.

Policy PP9 – The Transport Implications of Development

There was only one comment made on this policy.

Main Issues Raised

- Unacceptable impact needs to be defined in PP9 or without objective criteria it will be difficult to assess applications that fail to meet the standard. The developer will be expected to take measures to deal with the situation created not to alter the development so that the issues do not arise.

Main Changes to the Planning Policies DPD

- It is difficult to define unacceptable impact because it depends on so many different factors such as proposed use, location, links to highway network etc. Where possible these issues can be resolved through negotiation. Planning applications would only be refused if unacceptable impact cannot be resolved through negotiation. No change made to this policy. This is now policy PP10 in the Proposed Submission version

Policy PP10 – Parking Standards

There were three comments made on this policy.

Main Issues Raised

- We are objecting to Policy PP10 - Parking Standards as it is considered highly ambitious, and contradictory in its requirements. We feel Appendix A stating the Residential Parking Standards exceed the necessary requirements, and have not been sufficiently based on the needs of the local community. The policy is also inconsistent with PPG 13 that states the need to promote more sustainable modes of transport.
- Given the low ownership levels of electric vehicles, this level of investment (at least one parking space per dwelling should have easy access to a charging point for an electric vehicle) in infrastructure is not considered to be necessary.
- We object to the policy on two grounds: the parking space requirements for larger residential dwellings are too onerous as a minimum; we do not support the inclusion of a requirement for charging points for electric vehicles as part of this policy.

Main Changes to the Planning Policies DPD

- We have amended residential Parking Standards in line with the suggestion put forward by the objector. As for charging points in all residential development, we have left this in but have made it less onerous. The draft National Planning Policy Framework requires local authorities to support reduction in greenhouse emissions including incorporating facilities for charging plug-in and other ultra-low emission vehicles. This is now policy PP11 in the Proposed Submission version.

Policy PP11 – Open Space Standards

There were three comments made on this policy.

Main Issues Raised

- Sport England now supports this policy, as the standards of provision on which the policy is based were contained within the Playing Pitch and Outdoor Sports Study carried out on behalf of Peterborough City Council.
- We object to the policy on the following grounds; we object to the inclusion of Neighbourhood Parks; we suggest “Natural and Semi Natural Greenspace” is renamed Informal Parkland and Natural and Semi Natural Greenspace. We seek clarification that the requirement for synthetic pitch provision is included within and not in addition to the overall provision of 1.0ha/1000 population. We suggest the wording “amenity greenspace” should be amended to clarify what is meant by this term (eg. “amenity and incidental greenspace within development areas”). We consider further information should be included to demonstrate how the local authority intends to determine the amount of amenity green space required. We support the deletion of “country parks” as previously proposed (within PP35 - Open Space Standards: Option 85 (Issues and Options 2008).
- The policy needs to be amended to properly reflect the recommendations of the Atkins study and the approach to developer contributions as set out in Table 12.2 of the report.

Main Changes to the Planning Policies DPD

- We have updated the Open Space Standards based on the recent study carried out by Atkins. This study updates the 2006 work and takes into account any relevant studies carried out since and latest government guidance. New Open Space Standards are based on up-to-date information and with robust evidence.
- We have clarified the requirement for synthetic pitch provision and “amenity greenspace” in the standards. Some minor improvements to the wording of policy PP11 have been made and Appendix B revised to include up-to-date standards. This is now policy PP12 in the Proposed Submission version.

Policy PP12 – Nene Valley

There were two comments made on this policy.

Main Issues Raised

- We welcome this policy, but would like the word “heritage” inserted into the list of values contained in point (b), particularly as Paragraph 3.12.1 states that the Nene Valley is an area of heritage value. This would ensure consistency between the policy and supporting text.
- We also recommend that the policy is strengthened and given a positive slant to recognise, protect and enhance strategic wildlife corridors along the Nene and its tributaries. We therefore recommend amendments to improve this policy

Main Changes to the Planning Policies DPD

- We have restructured the policy and revised the wording taking account of the comments made above and for clarity. This is now policy PP13 in the Proposed Submission version.

Policy PP13 – The Landscaping and Biodiversity Implications of Development

There were two comments made on this policy.

Main Issues Raised

- We suggest an amendment to the current wording of part a) of the Policy to read: (a) “ the retention and protection of trees and other natural features which are of major importance to the quality of the local environment provided this does not unduly compromise design quality
- The policy can further be strengthened by including something on investigation and appropriate protection of the aquatic environment and Water Framework Directive.

Main Changes to the Planning Policies DPD

- We have amended the policy to take account of the above representations. Trees are protected on the site when possible unless these unduly compromise the achievement of good design solution for the site. We have also included protection and where possible enhancement of water quality and habitat of any aquatic environment in or adjoining the site. This is now policy PP14 in the Proposed Submission version.

Policy PP14 – Heritage Assets

There were five comments made on this policy.

Main Issues Raised

- I support the inclusion of the property in the 'List of Buildings of Local Importance' Peterborough Policies Development Plan Document (Policy PP14). The policy can further be strengthened by including something on investigation and appropriate protection of the aquatic environment and Water Framework Directive.
- Proposed Policy does not conform to Central Government Planning Policy Guidance, in particular PPS5 as all proposed developments which may

potentially impact on Heritage Assets must as a minimum demonstrate that they enhance or improve the setting of the Heritage Asset.

- Suggested word changes to ensure Policy PP14 is made sound in accordance with Government guidance
- We welcome the aim to provide a policy that supports the Core Strategy historic environment policy (CS17). However, we have some concerns that Policy PP14 largely repeats the Core Strategy and PPS5 and does not tackle specific development management issues affecting the historic environment in Peterborough.
- Queensgate Limited Partnership has significant concerns, with draft Planning Policies DPD Policies PP14 and PP15, which relate to Heritage Assets and Buildings of Local Importance. PP14 could conflict with the Core Strategy and potentially constraining the ability for future development proposals in Peterborough City Centre to come forward.

Main Changes to the Planning Policies DPD

- We have completely revised this policy in collaboration with English Heritage, taking account of the comments made and in light of most recent Government guidance. This is now policy PP15 in the Proposed Submission version.

Policy PP15 – Buildings of Local Importance

There were four comments made on this policy.

Main Issues Raised

- Policy wording unclear as to its scope
- We strongly dispute that the British Sugar Offices, 269 -277 Oundle Road, is of “significant interest to the area” and that it is of “distinctive design and appearance” in any interpretation relevant to local listing.
- We strongly welcome the drafting of this policy and the city council’s efforts to identify and update its list of buildings of local importance (as shown in Appendix C). The test outlined in the policy needs to be consistent with PPS5.
- We note that the current drafting of Policy PP15 provides for some flexibility with the inclusion of point (c), which provides that development that affects locally listed buildings will be granted where “the benefits of the redevelopment scheme outweigh the retention of the building”. In view of the strategic matters at stake in the City Centre and on North Westgate, our view is that this does not go far enough to ensure that the deliverability of the Core Strategy Policy CS4 is not undermined.

Main Changes to the Planning Policies DPD

- The policy wording has been changed to refer to ‘public benefits’ rather than just ‘benefits’ and to delete reference to unclear types of consent. We have removed the British Sugar Offices from the Building of Local Importance list in response to the above comments, and corrected some other entries. We feel the policy now allows sufficient flexibility to allow proposals where the public benefits of the scheme outweigh the harm to the local importance of the building. This is now policy PP16 in the Proposed Submission version.

Policy PP16 – Ancient, Semi-Natural Woodland and Veteran Trees

There were no representations made on this policy but we have amended it in the light of officer comments. This is now policy PP17 in the Proposed Submission version.

Policy PP17 – Habitats and Species of Principal Importance

There were four comments made on this policy.

Main Issues Raised

- There is a need for changed wording to clarify the habitats and species being referred to and to avoid overlap with Core Strategy Policy CS21 and National Guidance.
- The draft policy is not considered to be in accordance with National planning policy guidance
- This policy is unclear and we suggest major re-wording is required to clarify the difference between statutorily protected species and S41 NERC Act Habitats and Species.
- We are very happy with the proposed wording of this policy

Main Changes to the Planning Policies DPD

- We have completely revised the wording of this policy, taking account of the comments made above and for clarity. This is now policy PP18 in the Proposed Submission version.

Policy PP18 – Drainage and Flood Risk Management

There were two comments made on this policy.

Main Issues Raised

- We consider the use of the term "suitable provision" to be too ambiguous and it should be set out more clearly within the policy or supporting text what constitutes "suitable provision". The timescale for the production of the Flood Risk Management DPD (including the consultation programme) should be identified. Decisions regarding the implementation of this policy are to be made using this guidance and this should be clarified
- The draft policy should include the requirement for Brownfield sites to seek to separate surface water from combined sewers

Main Changes to the Planning Policies DPD

- We have revised the wording of this policy taking account of the comments made above and for clarity. This is now policy PP19 (Flood and Water Management) in the Proposed Submission version.

Chapter 4 – Potential Changes to Village Envelopes

- 4.1 The Consultation Draft DPD sought views on proposed minor changes to Maxey and Wothorpe village envelopes and we received no

objections to these changes. Therefore, they are included in the Proposed Submission version.

- 4.2 Some respondents did not agree with our decision to not include their sites in the village envelope in the Consultation document, and further changes to other village envelopes were suggested by local residents during the consultation period. In each of these cases officers have sought the views of the relevant Parish Council before making a recommendation. The changes sought, the Parish Council response and officers' recommendations are discussed below.
- 4.3 In Helpston, there was a request to include 5 and 7 Heath Road and their garden area within the village envelope. The owner of the site did not agree with our decision for not including their site within the village envelope. We consulted the Helpston Parish Council and included with the letter the representation submitted by the owners. The Parish Council objected to the two suggestions put forward. Officers agree with the Parish Council reasoning and no change will be made to include 5 and 7 Heath Road within the village envelope.
- 4.4 A new suggestion was put forward to include land rear of 12, 14, and 18 Nene Way within the village Sutton village envelope. Sutton Parish Council objected to this proposal and officers agree with their view.
- 4.5 A new suggestion was put forward to include some land next to the Stables in the Wothorpe village boundary. The Parish Council did not comment on the proposal. Officers cannot see any compelling planning reasons to change the Wothorpe Village envelope here.
- 4.6 The change suggested for Newborough was to include rear of 70 to 90 Guntons Road and their garden areas in the village envelope. We consulted the Newborough Parish Council who then held a public meeting at which it was reported 34 residents attended. They opposed the proposal to change the village envelope.
- 4.7 After carefully examining the representations made by the residents in support of this boundary change, officers consider that a change in this location can be justified for the following reasons:
- The suggested change runs along a well defined boundary (Mossops Drain) which meets the criteria for the definition of village envelope boundaries.
 - The existing alignment has no logical features on the ground and cannot be defended
 - Although the boundary change has the potential to create an area for development, this will be severely restricted due to risk of flooding in the area and multiple owners.
 - Newborough is a Limited Growth Village, and even if the additional land was developed for housing, the number of dwellings delivered would not be contrary to the settlement hierarchy in the Core Strategy.
 - The boundary change will allow all residents in the area to use their garden to the full potential rather than be restricted by the village envelope.

- 4.8 A minor change to Thorney village envelope was suggested. A small piece of land to the rear of 39-41 Station Road to be included which is currently outside the village envelope. Officers consulted Thorney Parish Council who raised no objection to the proposal. There are no valid planning reasons why it cannot be included and so we recommend the amendment.

Chapter 5 – Implementation and Monitoring

- 5.1 We have revised this section taking into account the comments made and in view of the recent draft National Planning Policies Framework.

Appendices

These are linked to the policies in section 3 such as Parking Standards (Appendix A (policy PP10)), Open Space Standards (Appendix B (policy PP11)). Any revisions to an appendix are discussed in the section dealing with the policy.