

The following are the main points from the Civic Society's response to The Issues and Options Consultation document referred to under the [Local Plan Review](#) entry of our website:

Vision

We applaud the City Council's vision for the city, particularly the importance of the historic city centre and its attraction for tourists visiting and staying in the city. Cities are known by the quality of their centres and Peterborough must continue to enhance and improve the attractiveness of the heart of our city.

Housing need

Our view is that the Plan period should run until 2041 (the statutory requirement) and not be extended by a further 3 years to 2044. Our reasoning for this is so that the standard 15 year Plan period allows a better degree of review and adaptability so that environmental and other parameters that may come into consideration in the late 2030's are better able to be included.

Peterborough has at various times over the last 10-15 years been one of the fastest growing cities in the UK and has accommodated a large amount of growth since the closure of the Development Corporation in 1988. There should therefore be no intention to go beyond the current housing targets set for the city given that this would impose a greater demand on the existing transport infrastructure, health services and educational provision, and likely lead to a loss of greenfield sites within the area. It is also important that the existing landscape character of the city is maintained and this would be damaged by potential additional housing growth on greenfield sites. Our perception is that there are already a lot of unbuilt schemes allocated for the city and more detailed figures for the current take up of land are needed to understand the current status of housing supply.

Land for employment

Peterborough should aim for high skills employment which has a more effective use of land over large scale storage/warehouse facilities of which many have been constructed around the city in recent years. The city needs quality sites for new businesses to locate and grow- similar to that of the Lynch Wood Business Park, which is still the prime office park in the city. We would identify potential quality employment land (as opposed to industrial parks) as being the East of England Showground site and remaining undeveloped land at Cygnet Park in Hampton.

We agree that Business Parks should be separately defined and identified from General Employment Areas. Further data is needed on what the current land availability is for both these land uses. Data are also needed on currently allocated/approved employment areas that are yet to be developed and the scale of unoccupied premises in previously developed employment areas.

Settlement hierarchy (eg ranking large settlements, large villages, small villages etc)

The Settlement hierarchy should remain as defined in the current Local Plan with the majority of growth concentrated on the city of Peterborough plus the larger villages of Eye and Thorney and the existing urban extensions.

Settlement boundaries (the envelopes within which development can take place)

These settlement boundaries could be reviewed and adjusted on an individual basis but only if there is a careful assessment that such a change would not adversely impact on the character of the settlement. More villages within the district should be encouraged to have their own Neighbourhood Plans as a guide to reviewing possible changes to the settlement boundary.

How should Peterborough Grow?

PCS view is that Options 2 (urban area/urban extension) and 3 (village extensions) are those that should be adopted. Option 5 (small sites across urban and rural areas) is totally contrary to the aim of creating sustainable communities. Regarding Option 4 (freestanding new settlements) we consider there is no proven need for these within the Peterborough area.

Climate change

The council should be doing all it can to mitigate the effects of climate change. Key to this is investing in greener public transport systems which are environmentally friendly encouraging less need for people to use their own cars. The city-wide cycling infrastructure needs to be enhanced and more cycle lanes should be added to the city centre streets and in the industrial estates. The Green Wheel should be properly maintained. Policies should include treasuring and enhancing green spaces and recognising their role in carbon capture, planting trees in streets where on-street parking is frequent and where concrete is the prevalent surface (because concrete cannot soak up water) creating wildlife friendly corridors throughout the city which will mean providing plants and flowers for pollinators. The location of green space should take into account flood risk and could be created to mitigate the effect of future sea rise on the city. We urge more sustainable buildings, with green walls etc, innovative traffic controls to make sure that traffic pollution is kept to a minimum, and the introduction of electric charging points for cars in city streets.

City centre regeneration

a) Policy to cover the city centre- we agree that such should exist as it is by the quality of the city centre that Peterborough will be judged.

b) Specific site/area policies. These should be formed to relate to the importance of maintaining the visual dominance of the cathedral and particularly the central and western towers, bearing in mind that despite its bulk, and due in part to the local topography, it remains a 'vertically challenged' cathedral in a national context. Maintaining a positive first impression of the cathedral being dominant on the skyline of the city centre is critical for visitors to the city.

c) There should be a strict policy on building heights which should require a thorough assessment of the existing views towards the cathedral from that aspect and ensure that the proposed design is informed by a requirement to preserve and enhance the existing vistas. A Cathedral Views Study is currently under preparation by Consultants appointed by PCC- this document has been long in gestation and is overdue for completion. When completed and accepted it should have the status of a Supplementary Planning Document.

A previous iteration of the Local Plan contained a Core Strategy Policy CS17 regarding cathedral views, and this contained a map indicating the viewing cones and points from which cathedral views can be attained. The new Cathedral Views Study should contain an enhanced version of this plan so there is no doubt with building developers whether a particular site sits on a key viewpoint.

Renewable and low carbon energy

a) We welcome the fact that PCC will encourage such schemes. However, our view is that any site in the city might, and should, be encouraged to include such energy efficiency and generation methods; it might be that an existing building roof is just as able to include energy generation measures as a new building. All should be encouraged/required to address such energy generation solutions.

b) We feel that a study needs to be commissioned by PCC in order to try and identify those technologies that might be effectively included in new and existing structures within Peterborough.

Energy efficiency

Whilst the Building Regulations are the main piece of legislation to try and reduce energy use in new buildings, we would support PCC in a Local Plan Policy that required developers/builders to submit an Energy Performance Statement as part of a Planning Application process. This could have the effect of ensuring that designers fully consider building orientation/shading/energy generation potential for any site at the outset of the design process.

Embodied carbon

This applies to buildings and the materials in their construction. The Society would support local plan policies for buildings and developments which includes durable, sustainable and energy efficient materials. PCS would encourage the retention and re-purposing of existing buildings rather than demolition and redevelopment on the basis that the greenest buildings are those that already exist and the embedded carbon and energy used in construction of those structures should not be wasted.

Design and amenity

The concept of having design codes to inform site proposals is welcomed but these must be site/settlement specific- there should be no presumption that general design parameters can be repeated throughout the area as this would mitigate against preserving the distinctive character of the range of settlements around the city.

There should also be design codes/guidance for the City Centre and for retail frontage signage (there was a PCC Shopfront Design Guide several years ago and this should be updated to avoid the unfortunate cases of poor shop signage within the city centre. It will be important to maintain a high standard of design in the city centre given that this will be primarily what visitors to the city will appreciate.

Housing standards

a) We agree that wheelchair designed housing should be provided where a need is identified.

b) we agree that space standards for all new homes should be applied- building very low area dwellings is not a sustainable long-term approach to housing provision.

Custom build

We agree that sites should allow for the provision of such housing and this should also include village locations which might have the advantage of enhancing the existing settlement character rather than having standard pattern-book house types used by volume housebuilders.

Traveller sites

Care needs to be taken with the best location for Traveller sites and therefore a requirement to provide such on large housing sites would not be the best way to make this overall city provision.

Park homes and houseboats

Any provision for park homes should be as part of the urban area i.e. not in village or open countryside locations. Temporary mooring for houseboats should be available on the Embankment

area. Illegal permanent mooring degrades the riverside environment, discourages recreational use of the riverside and should not be allowed.

Subdivision of dwellings

We agree that provision of purpose-built accommodation for multiple occupation should primarily be in the city centre where there is a higher provision of facilities to better serve occupiers.

Culture, Leisure and Tourism

We believe that community facilities should remain within the same policy as culture, leisure and tourism as they are a vital element in allowing access for all citizens to culture and leisure in the city- they should not be separated.

Historic Environment

The protection afforded to the historic environment should be continued into the revised Local Plan.

PCS is highly supportive of the value identified of those non- designated heritage assets of local interest (the Local List) and wishes to see the expanded number that were identified in the 2022 consultation process added to this established List.

Green and blue infrastructure

We agree with the importance to city residents of such infrastructure. In addition to requiring developers to consider this fully as part of the site development process we believe Peterborough is well-placed to be able to enhance the existing green infrastructure in the heart of the city. in the city-wide wide context-these and other smaller spaces need better protection by way of specific designation. The experience of the Covid pandemic has shown the importance of The Embankment as a vital green space in the heart of the city. As more and more residents live in the city centre and the University develops to its intended capacity of over 12000 students, this area will become increasingly important; indeed when the new River Nene pedestrian footbridge is constructed this will allow easy access for the residents of Fletton Quays to use this space.

Landscape Character

One of the key features of Peterborough sitting on the edge of fenland to the east is how this open space sweeps into the city centre and maintains the historic relationship of the cathedral and city centre with the open land to the east. We have noted above the vital importance of maintaining the Embankment as public open space and resisting any proposals to build on this land - this policy should be carried forward to the revised Local Plan and should aim to create an enhanced quality of the open space and river frontage to increase the number of citizens drawn to this area.

Biodiversity

Our view is that Peterborough should not plan to go beyond the 10% net gain target for new development as it is uncertain as yet whether this would impose an unworkable target for viable site development.

Street Trees

Street trees have shown their value both for visual amenity and the cooling effect they have for associated properties, roads and footpaths. As such it is important that existing street trees are retained. Street trees ideally should be included on all new housing development but should this prove impractical then it is the major circulation and access roads that should be so enhanced.

Flood and Water management

The updated Local Plan should call for SUDS (Sustainable Urban Drainage systems) on all schemes so that there is no increased run off to watercourses as a result of new development. We support the call for greater efficiency in the use of water in new housing and commercial buildings. Rainwater storage solutions should be encouraged wherever practical to do so.

Priorities

This question lists 10 priorities for the Local Plan to concentrate upon in the coming years but asks that we choose only five of which to prioritise- we find this an impossible question to respond to- all 10 items noted are important to the future of the city and all should be enshrined in the new Local Plan- to have the aspiration to bring all these aims about is surely what the Local Plan process aims to do. There should be no areas of improving the city that have to take a back seat.

Peter Lee and Derek Brown - January 2024
Peterborough Civic Society