

Peterborough City Council Draft Local Plan Regulation 18b Consultation – March-May 2025

Homes England Representations:
Land North of Castor and Ailsworth/
The Nene Valley Villages



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Executive Summary

This document forms Homes England's representations in relation to the Draft Peterborough Local Plan (2024-2044), which is to be read in conjunction with the draft Land North of Castor and Ailsworth Ambition Statement.

Homes England is the sole landowner of c.350 hectares of land to the north and west of Castor and Ailsworth. The draft Local Plan allocates approximately 220ha of this land to deliver a new settlement for approximately 3,000 homes and a Country Park.

The supporting draft Ambition Statement shows one way in which the draft allocation can be brought forward in accordance with the vision, objectives and draft policies of the Plan. It sets out Homes England's aspiration for this allocation to deliver a series of linked villages to provide new homes, jobs and supporting infrastructure as part of a thriving community, referred to as the 'Nene Valley Villages'.

The draft Plan is strongly endorsed and these representations set out comments in relation to and in support of the spatial strategy, vision, objectives and policies of the Draft Local Plan with a focus on demonstrating the proposed allocation of the Nene Valley Villages within Policy LP55 is suitable, available, achievable and deliverable. The site will make a meaningful contribution to Peterborough's development needs both within and beyond the proposed Plan period.

While the Plan is supported, PCC is encouraged to consider whether consideration should be given to increasing the housing target for the emerging plan based on affordable housing and employment growth needs. Should a higher housing target be incorporated then additional housing land is available within Homes England's ownership that could form part of the Nene Valley Villages proposals. This additional land could also contribute to the council's shorter term housing land supply as well as providing a longer-term robust housing land supply beyond the next plan-period.

In addition to considerations of the Nene Valley Villages as a strategic allocation, these representations also provide commentary on all the draft policies within the plan, identifying where changes may be required to provide greater clarity.

1. Introduction

- 1.1. Homes England is an executive non-departmental public body, sponsored by the Ministry of Housing Communities & Local Government, and the government's Housing and Regeneration Agency.
- 1.2. Homes England has the aspiration, influence, expertise and resource to drive positive market change. By releasing land to make homes happen, Homes England assists in the delivery of new homes and helps to improve neighbourhoods and grow communities. We work in collaboration with partners who share our ambition, including local authorities, private developers, housing associations, lenders and infrastructure providers.
- 1.3. Homes England's 2023-28 Strategic Plan sets a mission to drive regeneration and housing delivery to create high-quality homes and thriving places. This will support greater social justice, the levelling up of communities across England and the creation of places that people are proud to call home.
- 1.4. A key focus for Homes England is championing environmental sustainability, design and beauty in homes and places that we support to create distinctive places and spaces that are designed for people to use and thrive.
- 1.5. These representations are pursuant to the Draft Peterborough City Council 2024- 2044 consultation (referred to as the 'Draft Peterborough Local Plan'). This response relates to Homes England's interests as landowner of the land identified under Strategic Policy LP55: Land North of Castor and Ailsworth of the Draft Peterborough Local Plan), which we will refer to as the Nene Valley Villages.
- 1.6. These representations set out our support for the draft Peterborough Local Plan (2024 – 2044) as a whole, including the allocation of Land North of Castor and Ailsworth (Strategic Policy LP55). The Plan provides a strong basis for meeting housing and other development needs for Peterborough up to 2044.
- 1.7. These representations have been formed through comprehensive assessment of the site and iterative testing of its development potential and set out a considered view on the understanding of Nene Valley Villages. The representations set out the following:
 - Commentary on the spatial strategy, vision and objectives of the draft Plan.
 - Focus on the Nene Valley Villages opportunity and relevant policies.
 - Detailed comments on all other policies within the draft Plan.
 - An analysis of additional opportunities the Nene Valley Villages offers in meeting strategic objectives of the draft Plan.
- 1.8. In support of our representations, we also enclose a draft Ambition Statement which presents a draft spatial framework for the future development of the land north of the A47 – showing one way in which the policy requirements of the draft Local Plan can be met within the site. The draft Ambition Statement describes the 'Nene Valley Villages' concept which adopts a sensitive and design led development concept that comprises of distinct but connected villages within the

draft allocation boundary. This document should be read alongside the draft Ambition Statement.

2. The Peterborough City Draft Local Plan (2024-2044): Spatial Strategy

- 2.1. Homes England is supportive of the overarching spatial strategy that sits behind the Draft Local Plan. The proposed spatial strategy presents a positively prepared vision for the growth of the wider City administrative area that will effectively meet the wide range of development needs to achieve sustainable development, meeting the requirements of Paragraph 16 of the NPPF.
- 2.2. Paragraph 1.1 of the Draft Local Plan sets out that the planning policies and proposals for growth and regeneration is until 2044. This vision aligns with Paragraph 22 of the NPPF (2024) which requires development plans to look ahead over a minimum 15 year period from adoption (2026). A slightly longer 20 year plan period offers strategic advantages to ensure there is greater certainty over long-term infrastructure investment and achieving housing and economic needs. Homes England is supportive of the proposed plan period and the draft allocation of Land North of Castor and Ailsworth is able to contribute strongly to this positive vision, in the Plan period and beyond.
- 2.3. Given the delivery of homes from the site extends beyond the plan-period, the allocation of the site and its delivery appropriately provides a longer-term vision for the area in accordance with Paragraph 22 of the NPPF.
- 2.4. The strategic policies provide a clear vision and pattern for how development can come forward and be supported by infrastructure and community facilities while preserving and enhancing the existing natural and built environment.
- 2.5. The spatial strategy as currently presented meets the tests of Paragraph 36 of the NPPF by:
 - Being positively prepared to meet the standard methodology and housing and economic needs of the area with suitable buffers to ensure a robust delivery strategy.
 - The spatial strategy is also ‘justified’ as per the requirements of Paragraph 36 b) in presenting an appropriate strategy when tested against the reasonable alternatives in the Sustainability Appraisal (SA). The SA comprehensively considers the reasonable alternatives to the strategic policies including seven options for the distribution of housing growth across the area. The analysis within the SA clearly demonstrates that the preferred spatial growth approach is an appropriate strategy when compared with the other options presented.
- 2.6. The preferred spatial strategy diversifies the supply of land to meet a range of objectives – including the regeneration of Peterborough City Centre - while ensuring that development needs can be met during the Plan period. This strategy aligns with Paragraph 22 of the NPPF.
 - Effective in that the sites identified in the strategy have all been promoted as being available and tested through the SHELAA process and with initial viability analysis to demonstrate the sites are deliverable over the plan period.

- Fully consistent with national policies in meeting the three overarching objectives of sustainable development as set out at Paragraph 8 of the NPPF.

- 2.7. In addition to the comprehensive SA, the Strategy for Accommodating Growth Document provides a further analysis and explanation behind the level of growth intended within the plan and the proposed spatial strategy. The Plan identifies a balanced combination of all the different spatial options tested to distribute growth proportionately across the administrative boundary but retaining a focus on city centre and urban development and utilising new strategic settlements to ensure levels of growth are sustainable, deliverable, avoiding disproportionate growth in specific locations. Furthermore, larger strategic scale development provides greater opportunities for development to fully fund and deliver wider physical and social infrastructure.
- 2.8. It is evident that while some Greenfield sites are needed to ensure delivery of the Plan over the Plan period, the preferred strategy remains focussed on a City Centre first regeneration as identified at Policy LP5 (see below). It is considered that this approach strikes the right balance in not being impractically over-reliant on the City Centre to meet housing needs.
- 2.9. For example, Option 2 in the SA tests an option of delivering 95% of new housing in the urban area (including urban extensions) and this scores lower in terms of sustainability scoring than the preferred growth option. Furthermore, from the evidence presented, there are not enough available and deliverable sites within the urban area to achieve 95% of new housing within the urban area and the option would not provide the diversity of housing typologies that the preferred balanced spatial strategy could deliver. It is also well documented that there are greater viability challenges associated with City Centre redevelopments due to higher existing land values and challenges associated with the remediation of brownfield sites to facilitate development and therefore such an alternative strategy would not be effective in long term development needs.
- 2.10. Overall, the preferred strategy strikes an appropriate balance and has been evidenced as a suitable spatial strategy to meet the growth needs of the City supporting the regeneration of the city centre and deliverable housing growth.

3. Policy LP55/Land North of Castor and Ailsworth (the Nene Valley Villages)

- 3.1. Homes England is the sole landowner of the land identified within Policy LP55 (Land North of Castor and Ailsworth).
- 3.2. As demonstrated through the supporting evidence base documents and Sustainability Appraisal, the allocation is a suitable, sustainable, achievable and available site that will make a meaningful contribution to meeting development needs over the Plan period and beyond.
- 3.3. Draft allocation LP55 presents a strategic opportunity to deliver a significant level of growth in a highly sustainable manner, enabling the delivery of supporting infrastructure while also protecting and enhancing the surrounding natural and built-environment.
- 3.4. While the draft allocation is shown as a single allocation with the potential to deliver at approximately 3,000 homes, the Plan presents an opportunity to reimagine how strategic growth can be delivered in this part of Peterborough that better reflects the organic growth of village settlements to date.
- 3.5. To illustrate the potential, a draft Ambition Statement has been prepared that shows how a network of 'village style' settlements could come forward within the allocation boundary, resulting in the building of new communities that take account of environmental sensitivities while also ensuring that new homes are serviced by new infrastructure, facilities and local services.
- 3.6. The draft Ambition Statement demonstrates how collectively the series of new villages can work in combination and alongside the existing villages of Castor and Ailsworth to meet the draft policy requirements set out in Policy LP55 and other relevant Strategic Policies. Therefore, making a significant contribution to a wide range of land uses and ensure a sustainable pattern of development that supports and complements the wider aspiration for City Centre growth.
- 3.7. The Nene Valley Villages present a unique opportunity to deliver a highly sustainable new community to Peterborough that will offer genuine nature-based, social and economic benefits to the area.
- 3.8. The draft Ambition Statement sets out clearly one way in which the site could come forward, underpinned by the following four pillars that respond positively to the opportunities and constraints of the site:
 - **Living alongside nature & heritage** - conserving and enhancing the existing environment through nature conservation / enhancement and celebrating the area's rich heritage.
 - **A cohesive community** – creating a new community that serves the needs of a broad demographic by incorporating the Town & Country Planning Association's Garden Village principles. The Nene Valley Villages will be an inclusive modern interpretation of village

living, providing facilities for a broad demographic through incorporation of multi-tenure and diverse housing typologies and facilities that cater to young and old alike.

- **Inclusive Growth** – providing flexible and viable employment spaces that support the City’s wider growth ambitions, taking advantage of opportunities to support the high level of start-ups coming out of the City, to ensure they are retained within the local area and given the platform to scale-up as they grow.
- **A Connected Peterborough** - the Villages will be developed around an inter-connected movement network optimising internal movements for the proposed community, improving connectivity around the surrounding existing villages, and creating wider connectivity to Peterborough City Centre through active travel and public transport links.

3.9. It can therefore be demonstrated that the village concept would be fully aligned with the overall spatial strategy set out within the draft plan, providing for sustainable levels of growth required in the area whilst also supporting the objective of City Centre regeneration.



Illustrative framework plan from the Ambition Statement

3.10. The allocation of the ‘Nene Valley Villages’ presents a unique opportunity to deliver a significant level of growth in a highly sustainable manner, enabling the delivery of supporting infrastructure while also protecting and enhancing the surrounding natural and built environment.

3.11. The village concept builds on the existing settlement pattern, while also re-imagining the traditional English village for the 21st century. It presents an unrivalled opportunity within Peterborough to create a modern mosaic of nature, homes, facilities, jobs and spaces that support the growth ambitions of Peterborough now and in the future, while being created in partnership with the community and building on the success of existing long-term stewardship arrangements in the area.

- 3.12. Adopting a village concept in this location responds to the historic growth pattern within the surrounds of the main Peterborough urban area and is reflective of how the villages of Castor and Ailsworth co-exist today. The Villages will have their own distinct character, set within the heritage-rich landscape context of Peterborough, and provide extensive community infrastructure, residential uses, employment opportunities, public open space (including a country park), tree-lined streets and footpaths, and ecological enhancements.
- 3.13. Through the draft Ambition Statement, it can be demonstrated that the key policy requirements set out under draft Policy LP55 and other policies in the draft Plan can be met, in as much as the Nene Valley Villages are: both suitable and deliverable.
- 3.14. The SA and SHELAA consider the site and the development prospects of the proposed allocation in detail, identifying where there is a risk of potential negative effects and how these can be mitigated. Compared to other sites, the SA shows that the site itself has relatively few baseline negative impacts against the SA objectives, restricted to biodiversity and soil impacts. The SA shows how these can be mitigated through the development of the draft policy and these are discussed below.
- 3.15. There are relatively few constraints within the site, the most significant being the high-pressure gas pipeline that runs through the centre of the site at the position of the proposed Country Park. Homes England has been in early engagement with the Health and Safety Executive (HSE) who would be the statutory consultee for any application on this matter. HSE have confirmed that the proposed distances allowed for within the draft Ambition Statement plan provide sufficient offsets from the pipeline to the proposed housing and other uses. The pipeline is not, therefore, a constraint to the development of the villages.
- 3.16. The site is located outside of the more constrained areas of the wider Peterborough City Administrative area (most notably the areas to the east of the City Centre which have high floor risk as demonstrated at Figure 4-1 of the Level 1 Strategic Flood Risk Assessment), sited close to good transport links and is of a scale that can secure the delivery of improved local facilities and services. The site is sustainable and ideally located to make a significant contribution to the housing, infrastructure, and economic priorities of Peterborough, over the Plan period and beyond, helping to meet the development needs within the City council area.
- 3.17. While the draft Ambition Statement set out a number of potential guiding principles for future development, the composition of the Villages will be developed through a locally led visioning and masterplanning process, (as required by Policy LP55) ensuring that the delivery trajectory is informed through the timing of infrastructure and that a suitable mix of land uses is provided at the appropriate time.
- 3.18. The site is in the single land ownership of Homes England therefore, there are no land-assembly challenges associated with its delivery.
- 3.19. Whilst the Viability Assessment provided with the evidence base does not test the proposed development (as it was undertaken in May 2024 and tested the potential strategic site of 5,000 homes) it clearly demonstrates that there are no apparent viability challenges to delivering the site. Homes England has been running internal viability testing of the development alongside a

suite of technical assessments and is confident that the proposed development, including all the anticipated infrastructure requirements and policy-compliant affordable housing can be delivered whilst maintaining a positive residual land value.

Provide a diverse housing mix meeting ensuring effective Housing Delivery over the Plan period

- 3.20. The proposed network of villages can provide for the delivery of approximately 3,000 new homes. This has been confirmed through initial capacity testing of the site, having full regard to its constraints which include the high-pressured gas main which runs between Villages 2 and 3.
- 3.21. Aligned with the strategic objectives of Homes England's Strategic Plan, initial testing of the concept plan set out in the draft Ambition Statement confirms that the site can provide fully compliant levels of affordable housing and secure sufficient diversity of housing tenure to meet the identified needs as set out in the Housing and Economic Needs Assessment (HENA) and draft housing policies LP2 and LP12 in the draft Local Plan. Given the delivery timeframes, sufficient flexibility could be retained through the draft Masterplan Framework required by LP55 to ensure that housing needs can be fully met over the Plan period and beyond, responding to updated evidence as required.
- 3.22. Given the phased delivery across the three villages and the potential to diversify the housing offer, the suggested delivery of at least 1,800 homes is achievable and could be delivered in the plan-period. While this is a reasonable assumption to inform the Plan, Homes England's role to unlock and accelerate delivery of sites means that it is likely that a higher delivery rate could be achieved.

Provide new Green Infrastructure and make a positive contribution to surrounding landscape and biodiversity objectives

- 3.23. As set out in the draft Local Plan, the site sits within the John Clare Countryside. It is therefore important that the principles of preserving and enhancing the nature led recovery ambitions for this area are embedded from the outset and requirements for this within Policies LP36, LP38, LP29 and LP41 are supported.
- 3.24. This landscape-led approach is at the heart of the concept plan within the draft Ambition Statement, where Local Nature Recovery and protection of the most valuable habitats have provided the starting point for considering how the allocation can deliver multi-functional benefits and support broader environmental objectives. Through the preparation of the draft concept plan, it can be demonstrated that the following features can be incorporated into any future scheme that would actively support the Plan's objectives:
- Aligning green corridors to connect existing and proposed habitats and open spaces
 - Ensuring every new home has access to new strategic green open spaces within 300m from their front door
 - Safeguarding green space – protected where necessary
 - Integrating sustainable drainage features to enhance the open space network and create new habitats
 - Create a wide range of new habitat typologies including woodlands, orchards, verges, grasslands, waterbodies and meadows

- Optimising on-site Biodiversity Net Gain with a target of achieving 20% net gain.
- Ensure the green infrastructure network delivers a range of open space typologies to provide active travel opportunities and meet recreational needs of the existing and proposed populations
- Avoid impacts on the surrounding habitats including the Castor Hanglands SSSI

- 3.25. As set out in the draft Policy, any Green Infrastructure strategy for the site will be focused around the delivery of a new significant Country Park – connecting the site with Nene Valley Park to the south – that will provide nature enhancement opportunities as well as substantial recreation land for the existing and wider communities.
- 3.26. Alongside other measures to protect more sensitive areas to the north of the allocation, the provision of a new Country Park will also act as an alternative greenspace as part of a strategy to alleviate recreational pressures on the nearby Castor Hanglands SSSI.

Can safeguard potential heritage assets

- 3.27. The ambition is to preserve the identified heritage of the site and the surrounding areas. The accompanying draft Ambition Statement identifies initial principles that can be embedded into a future masterplanning process to ensure the preservation and celebration of designated heritage assets in the surrounding areas. For example, the creation of strategic long-range viewing corridors to celebrate the Grade I listed Church of St Kyneburgha within Castor.
- 3.28. The site has also been identified as a potential location for below ground heritage assets. Homes England is taking early action to ensure that this is fully understood at an early stage to ensure that potential risks are appraised and that future masterplanning for the villages can incorporate, celebrate and if required, appropriately preserve below ground heritage assets in a meaningful and appropriate manner. Geophysical surveys have been undertaken across the site area and these will inform discussions with the local archaeologists to establish the best and most appropriate strategy for dealing with these assets as the scheme progresses.

Can provide flexible employment space to respond to changing market needs over the Plan period

- 3.29. The draft Ambition Document demonstrates that the villages provide an opportunity to deliver approximately 8ha of dedicated employment land. The strategic location of the site along the A47 and its proximity to the A1 and Peterborough City Centre means that there would be an opportunity to plan for a wide-range of employment typologies to respond to market demand over time, in line with up to date evidence and in support of the strategic employment network of the City Centre and the wider Cambridgeshire & Peterborough Combined Authority economic growth strategy.

Can support a wide range of new community facilities & local services

- 3.30. As noted above, the ambition for the Villages is to provide self-sufficient new communities that deliver the day-to-day services of residents without competing with the broader offer of the City Centre.

- 3.31. This is anticipated to include a wide range of social infrastructure and community facilities that meet the needs of the proposed new community but can also service existing areas where under-provision is identified.
- 3.32. For example, the existing area around the proposed villages is under-served by secondary education facilities, with most existing villages served by the catchment of the Arthur Mellows Village College which is 4.5 miles from the site. Therefore, existing students in the nearby villages (approximately one form-entry equivalent (1FE)) are required to travel significant distances to secondary school. Any new secondary facility can therefore be designed to meet existing needs as well as future demand as part of a comprehensive education planning exercise across the PCC administrative area.
- 3.33. Similarly, the site presents opportunities to also deliver new health facilities in consultation with the relevant ICB that would benefit both existing and future residents.
- 3.34. In terms of other community and leisure uses, the creation of new village centres provides the opportunity to provide a range of facilities and support services that meet identified local needs as well as what would be anticipated from future population of the development.
- 3.35. Using the supporting draft Local Plan Infrastructure Delivery Plan (IDP) and ongoing engagement with statutory stakeholders, specific requirements can be identified, tested in consultation with the local communities and incorporated within the masterplanning exercise required by LP55 to ensure they can be secured as part of a future planning application.

Will take a vision led approach to access & movement that will reduce reliance on the car

- 3.36. As noted above, the Nene Valley Villages can be designed to meet the day-to-day needs of future residents, reducing the need to travel, realising high levels of internalisation while also pro-actively encourage active travel and public transport usage. This can be secured as part of the integrated movement and transport strategy required by LP55. Given the inter-connected village concept, these benefits can also extend beyond the site to enhance connectivity by sustainable modes to and between the surrounding villages and to and from the City Centre – resulting in an overall reduction in trips locally made by the car.
- 3.37. A key aspect of the proposed site is the need to provide a new access to / from the site from the A47 to minimise development related traffic through Castor and Ailsworth. Initial discussions have taken place with National Highways on potential locations and designs of a new all-movements junction between and is considered achievable. The timing of the new access will be informed through the preparation of the transport strategy and strategic transport modelling.

Has the ability to meet all other policy requirements in the draft Plan

- 3.38. Through the requirements for strategic sites set out in Policies LP4 and LP53, appropriate mechanisms would be put in place, ensuring that the allocation meets the policy requirements set out in the remaining policies. These include the requirement to masterplan the site (either before or as part of a planning application), utilising Design Codes to establish and secure character throughout the development, and securing bespoke strategic infrastructure through S.106. While detailed proposals will be forthcoming through the future masterplanning process and preparation of an application informed by community engagement and consultation, the

draft Ambition Statement demonstrates how key principles could be incorporated as part of any future scheme. Further detail on how policy requirements could be met as part of the allocation and how these could be secured through these mechanisms is set out in **Appendix 2**.

Maximising Housing Capacity and Accelerating Delivery

- 3.39. We identify below that the Draft Plan housing targets are short of meeting the identified needs of the City and that the identified supply is not particularly robust, especially in the early years of the plan.
- 3.40. In addition to the allocated land, the draft Ambition Statement identifies further land within Homes England's ownership that could be incorporated into the allocation boundary that could accelerate and / or increase housing delivery over the Plan period. These two opportunities would be wholly aligned with the 'village concept' and would make a positive contribution to meeting development needs over the Plan period and beyond. Details of these opportunities are provided at **Appendix 1**.

4. Detailed Policy Representations

- 4.1. In accordance with Paragraph 36 of the NPPF (2024) and the need for plans to be prepared in accordance with legal and procedural requirements, and to be sound (positively prepared, justified, effective and consistent with national policy), we make the following policy representations on specific policies within the plan.
- 4.2. Other relevant policies have been considered within a detailed policy matrix provided at **Appendix 2** which identifies how the Nene Valley Villages can accord with the aspirations/tests of the various draft policies.

Policy LP1 Settlement Hierarchy and the Countryside

- 4.3. Homes England support the provision of a settlement hierarchy within the Local Plan. We recognise that Policy LP1 does not intend to exclude allocated sites, however, their omission from the hierarchy does present some possible ambiguity as to their future status and this should be set out expressly by a minor addition to the policy wording, for clarity.
- 4.4. This policy states all other residential development outside of village envelopes and outside of the Peterborough Urban Area boundary will be refused unless within a made neighbourhood plan. This wording does not obviously accord with Part D – The Sites of the draft Local Plan, which identifies the sites required to deliver the Local Plan target of a minimum of 20,120 dwellings on land that is not necessarily within village envelopes within the Peterborough Urban Area boundary.

Policy LP2 Spatial Strategy for the location of housing

Overall housing target

- 4.5. The Plan and the supporting SA set out that the draft Plan has sought to deliver a housing target and strategy that is based on the Local Housing Need (LHN) identified by the government's standard method. This is an appropriate and suitable approach to delivering the objective assessed housing needs of the area.
- 4.6. The SA also tests the alternative strategies of delivering fewer and more homes than the LHN requires. The option to deliver fewer homes is identified as having significant negative effects on several SA objectives and therefore is rightly discounted. The option of providing a higher housing figure scores similarly to the preferred approach of delivering the LHN figure.
- 4.7. The final update to the NPPF was published in December 2024 and contained a new standard method for Peterborough of 1,006 dwellings per annum (the LHN). New affordability data released in March 2025 has seen this subsequently rise to 1,021 dwellings per annum. The draft Peterborough Local Plan covers the period April 1 2024 to March 31 2044, so covers 20 years. The dwelling target is 20,120, or 1,006 a year, in line with the new standard method from

December 2024 but does not reflect the most up to date recently published affordability ratio data.

- 4.8. We discuss below the rationale for why a higher housing target should be included in the emerging plan.

Affordable Housing Need

- 4.9. The HENA identifies that to meet the total annual affordable housing need of Peterborough of 477 new affordable homes per year, this would represent 44.7% of the total LHN figure which would not be plausible. The HENA, therefore, encourages the council to consider increasing the total housing figures included in the Plan to encourage the delivery of the identified affordable housing needs. This concept is further supported by the fact that the Plan identified economic growth that exceeds the identified need (see LP3 commentary below). The housing part of the HENA only tests the housing levels proposed against the forecasted economic growth needed, the implications of the Plan exceeding this level of growth is not tested but would inevitably drive up the housing needs of the area.
- 4.10. Notwithstanding the above, the HENA currently double-counts some of the pipeline affordable housing supply as showing as something already existing as well as something that would be counted against future needs when it is delivered in Table 6.1.
- 4.11. At Page 129 of the HENA 2024 Housing it is noted that:
- “The PPG indicates that ‘the committed supply of new net affordable homes at the point of the assessment (number and size)’ be taken into account within the model. The Council has reviewed its committed supply and provided an indication of the number of affordable units with planning permission that are anticipated to be built in the next few years. In total, there are 1,035 new affordable homes committed across Peterborough currently.”*
- 4.12. If the HENA 2024 Housing wishes to count pipeline supply as part of its modelling, then the entire pipeline supply should be removed from the total overall need. As it stands, pipeline affordable housing supply is being counted as something which already exists to reduce affordable need and then again as something which can also be offset against the overall future needs.

Economic Growth and Housing

- 4.13. If only the number of dwellings associated with the standard method for local housing need are provided for in the Local Plan, the strong economic growth in PCC may lead to a shortfall of workers against likely jobs growth and, therefore, potentially impede growth. We therefore consider that the emerging Local Plan will likely require an economic uplift to be applied to the overall housing target to balance the number of jobs and workers in the area.
- 4.14. The HENA 2024 Housing makes no reference to the balance of jobs and workers. Chapter 5 of the HENA 2024 Employment does state that:

“5.94 HDH Planning and Development have re-modelled population, and so labour supply growth in Peterborough – informed by the census data discussed above and the Standard Method. In their view this results in a labour supply growth over the plan period of c26,000 which is much higher than Oxford assumed.

5.101 Combined the adjustments mean that Peterborough would be planning for c24,900 new jobs, which is still c1,900 below the increase in labour supply.”

- 4.15. Therefore, collectively the two studies appear to assume a total of 19,656 dwellings (936*21, will yield a growth of c26,000 additional labour supply and that forecasted jobs growth will be around 24,900 over the same time period, which gives a surplus of 1,100 (not the stated 1,900) in labour supply. This is confirmed at paragraph 7.9:

“7.9 There is scope for the Council to provide for more new jobs than those identified in the economic forecasts, to align with Standard Method homes.”

- 4.16. The figure of c.26,000 additional labour supply in the context of 19,656 dwellings appears to be exceptionally high in light of an ageing population, with more people being in retirement. Table 5.1 of the HENA 2024 Housing models population in 2023 to be 221,040, rising to 265,103 in 2044, so there is projected to be a growth of nearly 44,000 over the 21 years.
- 4.17. We have undertaken our own review of the data and considered both the projected population and labour supply growth to be too high in the context of the delivery of 19,659 dwellings. Our modelling sees population rise by a much smaller amount, which in turn would leave a shortfall in the labour force. Therefore, our own modelling would support a need for a higher housing target in Peterborough to support jobs growth.
- 4.18. This shortfall is then further exacerbated by the Plan itself identifying employment growth that exceeds the HENA requirements. To support the level of economic growth currently envisaged in the plan, an increased level of housing provision is required so as not to impede its economic strategy.
- 4.19. Given the above, the Council should increase its overall housing target to help meet the affordable housing needs identified in the evidence base, and support the economic strategy and growth of the Plan.

Distribution of housing

- 4.20. Homes England is supportive of a healthy balance between urban, rural and new settlements, which aids diversification in terms of housing delivery. We are also supportive of the Plan’s ambition to meet its identified housing needs as required by national policy, with an appropriate buffer allowance of 10% to ensure a robust housing strategy.
- 4.21. Policy LP2 sets out the district’s spatial strategy and allocates 13% growth within new settlements with the majority of new development earmarked for either within the urban area of Peterborough (19%) or as urban extensions to the main settlement boundary (50%). Having regard to the Council’s evidence base, this distribution of growth across the administrative boundary is positive and realistic, reflecting the most suitable growth strategy for the area.

- 4.22. The mix of development across the urban area of Peterborough and then the wider administrative surrounds is logical to ensure a robust housing delivery strategy for the next plan period. Any greater reliance on the urban area boundary would not deliver the required housing numbers based on associated viability issues and would not address localised housing need.
- 4.23. The HENA identifies an overall mix of housing need as shown broken down in the table below. The overall housing needs, therefore, shows a requirement that almost 50% of new housing across all tenures needs to be provided as larger 3+ bedroom family sized homes. This further supports the spatial strategy of focussing the majority of new housing development on urban extensions and new settlements where there is greater space to provide suitable levels of family accommodation.

	Market Housing		First Homes		Shared Ownership		Social/Affordable Rent		Total	
Size of Home	Number	%	Number	%	Number	%	Number	%	Number	%
1 bedroom	3,972	29%	49	10%	391	26%	956	23%	5,369	27%
2 bedroom	3,600	27%	61	13%	393	26%	891	21%	4,946	25%
3 bedroom	2,546	19%	133	28%	386	25%	980	24%	4,046	21%
4+ bedrooms	3,364	25%	230	49%	361	24%	1,341	32%	5,297	27%
Total	13,482		473		1,531		4,168		19,657	

- 4.24. The Plan and evidence base do not provide a detailed breakdown of the anticipated housing trajectory beyond what is shown at Figure 5 – Housing Trajectory, included in the Draft Peterborough Local Plan. What this does show is a stretched housing trajectory within the first five years of the plan. Housing delivery from the proposed allocations only really peaks by 2032/33 so it will be challenging for the Council to maintain a five-year housing supply during these early years of the plan. The Council, therefore, may wish to consider publishing its detailed trajectory and should identify additional proposed allocations which are capable of delivering housing within the first five and ten years' of the Plan.
- 4.25. The Nene Valley Villages present an opportunity to further enhance the Plan's robustness for housing delivery as Village 4 (land to the west of the current allocation) and/or land west of Ailsworth, could come forward concurrently or even ahead of the currently drafted allocated development so as to bolster housing delivery as early as from approximately 2029/30.

Policy LP3 Spatial Strategy for Employment

- 4.26. Homes England is supportive of Policy LP3 which sets out details on the provision of employment land across the district. The Policy indicates that provision has been made to accommodate the 205ha of employment land across the plan period, of which 90ha would be from new dedicated sites as identified in Policy LP62.

- 4.27. Policy LP3 should, however, cross reference to Policy LP4: Sustainable Urban Extensions and New Settlements, to establish these areas as long-term employment opportunities that can come forward flexibly in response to changing market circumstances.
- 4.28. The Nene Valley Village site includes 7ha of the allocated employment land and has the capacity to deliver approximately 35,000 sqm of new employment space. This is a suitable amount of dedicated employment provision to be provided within the Nene Valley Villages to support the growth ambitions of the City and to help deliver a sustainable working and living community, whilst not competing with the City Centre. As noted within the supporting text to the policy, the Market Assessment (October 2024) identifies a strong industrial warehouse market. The Nene Valley Villages can help support the anticipated growth demands of this market, benefitting from good access to the A47 (including its proposed widening) and therefore the A1(M) corridor. This is supported by the HENA that recommends identifying sites on the west side of Peterborough to address the supply gap in the industrial and warehousing market.
- 4.29. It is noted that the plan identifies a total supply of 268ha of new employment land through a mixture of committed sites and allocations. This excess of employment land against the identified need may require further additional housing to be provided for within the plan-period to support this level of growth, as noted in our representations on LP2 above.
- 4.30. The HENA identifies an additional industrial land requirement for 90 ha, where the draft Local Plan allocation concentrates this delivery on a single large site at Land to the North East of Stanground (Policy LP61). This introduces risk to meeting this identified industrial need, as this single site may be stalled due to its complex constraints (in this instance including flood risk, heritage sensitivities, biodiversity concerns, and transport infrastructure challenges). To diversify the Plan's industrial employment land delivery, Village 4 is able to provide an industrial / logistics opportunity.
- 4.31. Site 2026a (Village 4) provides excellent access to the A47 and connectivity to the A1(M), making it highly suitable for a mix of housing, logistics, light industrial, and commercial employment uses in line with the identified demand and evidence of the HENA. Village 4 represents a strategic employment opportunity to deliver further employment land within this plan period. Its development should be actively promoted, particularly where it can offer:
- Alternative employment uses, such as logistics (B8), to meet the strong regional demand for this sector as evidenced by property market review and taking advantage of its proximity to the A1(M) corridor.
 - Diversified employment opportunities to enhance economic resilience and technology-driven training solutions for workforce upskilling and integration with sustainable transport networks and infrastructure to bridge the rural neighbourhood with the City centre.
- 4.32. The rejection of Site 2026a (Village 4) for mixed uses including employment overlooks its strong potential to support a balanced and sustainable community. Located adjacent to a major housing allocation (Site 2026b, Village 1-3) and with excellent access to the A47, the site is well-

suited for logistics, light industrial, and flexible commercial uses, meeting growing demand for local employment space and supporting hybrid working patterns. The site also presents an opportunity to support the City Centre with a mobility hub / park and ride facility that could capture commuters coming into Peterborough from the west A1(M) corridor.

- 4.33. Integrating employment land here would reduce out-commuting, enable walkable access to jobs, and capitalise on strategic transport connectivity to serve wider commercial functions. Given its locational advantages and alignment with modern work and mobility trends, the exclusion of employment use from Site 2026a (Village 4) should be reversed and the site allocated to deliver further employment land in-line as part of our Village 4 proposals.
- 4.34. Homes England recognise that the PCC aims to diversify local economic activities and employment opportunities, despite the strong market interest in strategic and non-strategic logistics during the local plan period. We are, therefore, broadly supportive of its economic growth strategy as identified within the Plan. However, there is an opportunity with the inclusion of Site 2026a (Village 4) to offer a flexible and responsive delivery approach that can accommodate a variety of employment opportunities alongside new housing, in a location with the right characteristics for this type of growth, to provide appropriate scale, good transport accessibility, and proximity to new or growing communities.

Policy LP4: Sustainable Urban Extensions and New Settlements

- 4.35. Policy LP4 sets out the requirements for new urban extensions and new settlements within Peterborough. The NPPF (2024) recognises at paragraph 77 that the delivery of a large number of new homes can often be best achieved through planning for larger scale development where they are well located, designed and are supported by necessary infrastructure and facilities. This is consistent with Para 22 of the NPPF. We, therefore, welcome the Council's approach to meeting the development needs of the City through the strategic scale developments to deliver housing, jobs, open spaces and high-quality services and community facilities.
- 4.36. The purpose of the policy is to identify the broad expectations that will be used as key principles for all large strategic sites and for the site-specific allocations to provide more details and site-specific requirements.
- 4.37. The requirements for these larger sites should incorporate sufficient flexibility to ensure they can respond to changing market circumstances throughout the lifetime of the development.
- 4.38. We encourage the use of a Section 106 agreement as outlined by Policy LP4 as a tool for infrastructure delivery on larger schemes. There should, however, be included some acknowledgement that the larger strategic sites will be subject to bespoke requirements that will be secured via S106 and will not, therefore, be liable to charges via the Community Infrastructure Levy.

Policy LP10: Energy Efficiency

- 4.39. Policy LP10 sets out how new and existing development can be energy efficient. Overall, Homes England is supportive of the aspirations of the policy but has some specific comments about some of the detailed aspects of the drafting.
- 4.40. Given the development plan seeks to address development now and in the future, we would suggest the policy offers flexibility to adapt to future developments in technology.
- 4.41. The requirement for each dwelling to provide at least 40% of its ground floor area for solar PV should be more flexible. The sustainability credentials of renewable energy provision is site specific and a blanket requirement to deliver solar PVs is not likely to be the optimum renewable energy solution for every single site. This approach would also not allow for new sustainable technologies to be utilised if they come forward during the plan-period.
- 4.42. In terms of the Nene Valley Villages, our ambition is that it will meet the policy requirements of LP10. The masterplan vision is to provide a sustainable development that positively contributes to local net zero ambition. On this basis, homes will be designed in full compliance with the Future Homes Standard. As per good practice design, fabric efficiency standards and use of passive design measures will minimise the overall energy requirements for each dwelling. Solar PV generation will be an integral part of design, aligned with primary energy calculations to meet the most up to date Building Regulation requirements.
- 4.43. Non-residential buildings will be designed with a similar rationale in terms of the Energy Hierarchy. This means minimising energy needs (in terms of space heating/cooling and domestic hot water provision) as far as possible. Electric-led space heating/cooling and hot water provision will be part of the design. Given potential for process energy requirements among future occupants, mains natural gas infrastructure will be retained recognising a potential future role for a re-purposed network using higher blends of hydrogen.

Policy LP11: Affordable Housing

- 4.44. In line with Policy LP11 and NPPF (2024) Paragraphs 64, 65 and 66, Homes England will aim to provide policy compliant affordable housing. We would recommend that the policy wording is amended slightly with added wording along the lines of 'subject to needs' to reflect current housing needs, linking to Policy LP12 Meeting Housing Needs.

Policy LP15: Custom Build, Self-build and Prestige Homes

- 4.45. Homes England is supportive of the above policy and its principles, however, in relation to the larger sites, we question the policy target of delivering at least 5% of the total number of dwellings as custom build or self-build homes. This target is not reflective of the identified needs for self-build and custom build housing in the HENA. A 1% target would be more proportionate and balance the current needs or demand in the area with an aspiration for increasing choice.
- 4.46. We suggest the below amendment to the policy wording to allow for flexibility on schemes and reflect the needs of Peterborough.

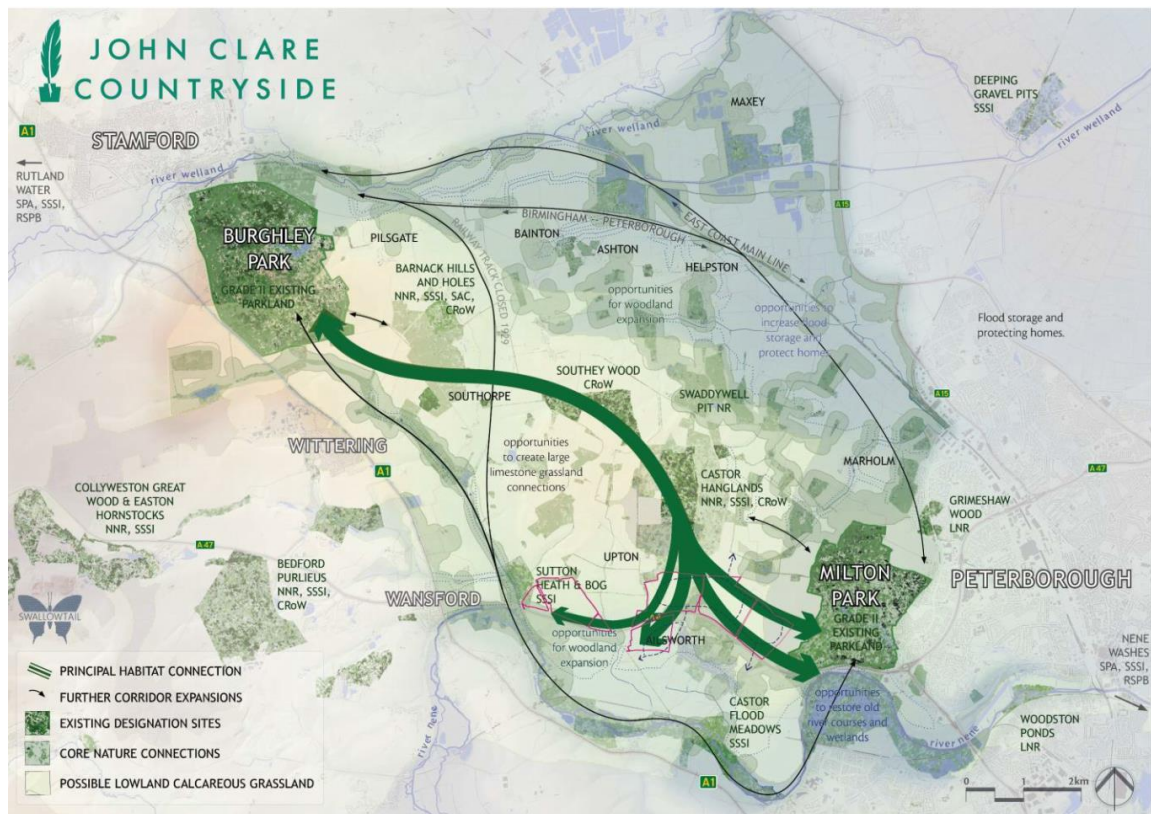
“In accordance with Policy LP4, proposals for 500 or more dwellings will provide serviced plots to aim to deliver ~~deliver at least~~ 1% (depending on latest level of demand) of the total number of dwellings on the site as custom build or self-build.”

Policy LP20: Town Centres

- 4.47. Homes England support the provision of a hierarchy of retail centres within the Local Plan. However, as currently drafted, the policy does not reference ‘new settlements’, instead only acknowledges ‘new centres’. It is therefore unclear how the developer or decision maker should interpret the policy in the context of the new local centres that will come forward within new settlements such as the Nene Valley Villages.
- 4.48. Reference is made in Paragraph 9.11 and in bullet point three of Part A of LP20 to ‘new centres’, however, these should be integrated within the hierarchy of retail centres to establish their status and role within the City’s network of designated retail centres.

Policy LP22: Leisure, Culture and Tourism

- 4.49. Policy LP22 of the Draft Local Plan highlights that the council will support the development of new cultural, leisure and tourism if it will benefit the economy, communities and help promote the image of Peterborough to attract more visitors. Paragraph 9.29 supports this policy through expanding on the facilities that are currently available in Peterborough.
- 4.50. Homes England wish to further expand on the ‘John Clare Countryside’ as mentioned in Paragraph 9.29. Recognising that the Nene Valley Villages can make a positive contribution to the objectives of this policy the site will be integrated into the vision for the area. The site will provide green routes which form part of the wider corridor from Burghley Park to Milton Park (as shown at a strategic level in the map below). The new country park will act as an alternative natural greenspace for recreation for existing as well as reducing the recreational pressure on the Castor Hanglands SSSI. Homes England support this principle and will work to ensure nature recovery alongside housing delivery.



Map of routes from Burghley Park to Milton Park with added annotations

Policy LP23 Community Facilities

- 4.51. Policy LP23 outlines the requirements for proposals for new and existing community facilities within the plan period. The Nene Valley Villages will align with the policy wording of Policy LP23 providing new community facilities as part of the wider development in line with Part C of the policy. The site will improve public access to such facilities as well as being able to bring residents together by providing cultural facilities.

Policy LP24 Infrastructure to Support Growth

- 4.52. Policy LP24 sets out that new development should be supported by and have good access to infrastructure.
- 4.53. The evidence base behind the plan needs further development ahead of Regulation 19 to demonstrate how the plan can deliver the strategic infrastructure required to mitigate the impacts of the Plan.
- 4.54. One key aspect that should be clarified within the next stages of the plan is how the larger strategic sites will be expected to deliver infrastructure via site specific S106 agreements rather than the wider CIL regime (refer also to our comments on LP4 above). Given the significant amount of site specific infrastructure required on these larger sites such as the Nene Valley Villages, it is unlikely that these schemes could support both the infrastructure required to be delivered and secured via a S106 as well as a generic CIL charging regime.

Policy LP25: Accessibility and Transport

- 4.55. The requirement under Part A: Accessibility of New Development of Policy LP25 to provide a TA and TP for major developments is in line with the guidance set out in PPG, however the wording should be amended to include reference to a '*vision-led approach within the TA*' as required by NPPF paragraph 118. This includes the requirement to undertake assessments in line with the ATE Planning Application Assessment Toolkit, follows the guidance set out by ATE for major developments.
- 4.56. To be consistent with the travel hierarchy and the requirements within the NPPF paragraph 117a, Part A point ii. should additionally be amended to read '***Prioritising active travel first, then public transport use over car use around the network.***'
- 4.57. The wording of Part B ii. should be amended to ensure it reflects the requirements of NPPF paragraph 116 in relation to assessing the impacts taking into account all reasonable future scenarios. Part B ii. should also refer to appropriate, cost-effective mitigation developed through a vision-led approach, in line with NPPF paragraph 115d.
- 4.58. It is important to make this distinction to ensure that mitigation is not focussed on car-dominant capacity increasing highway mitigation but is instead focussed on changing and embedding sustainable travel behaviours through the provision of attractive opportunities for active and sustainable travel that can be realistically accessed by all.

Policy LP26: Parking Provision

- 4.59. Policy LP26 sets out that parking provision should be available for all. Homes England believe that the Policy should provide more emphasis on active travel first, then sustainable public transport ahead of car travel, to ensure that development is not car-dominated. Reference to a vision-led transport assessment would provide important context in line with NPPF paragraph 118 in relation to the assessment of parking need to justify provision.
- 4.60. Embedding sustainable travel behaviours from day one of a development is key to their success. Requiring residential development to be built in line with traditional minimum parking standards will inevitably mean that new developments maintain the status-quo of car-dominated neighbourhoods.
- 4.61. New developments, and particularly new settlements present an opportunity, instead, for parking provision to be based on a vision-led demographic and spatial need assessment, with a monitor and manage strategy to ensure areas of the development could be reallocated to parking in the future if required.
- 4.62. Part B of the policy should be amended to reflect a vision-led assessment approach for residential development in new settlements as required by Policy LP4 / LP55, taking into account the location, size and active/sustainable travel opportunities available without requiring rigid application of the more traditional predict and provide minimums set out in Appendix 4 Parking Standards.

- 4.63. Where a made Neighbourhood Plan is in place containing residential parking standards, a vision-led assessment approach to parking need should still be required, superseding the parking standards within the Neighbourhood Plan, to ensure compliance with NPPF paragraphs 112 and 113.

Policy LP27: Walking and Cycling Infrastructure

- 4.64. Policy LP27 focuses on incorporating measures to facilitate active travel. The policy wording should refer to '*vision-led development*', which puts walking and cycling ahead of other modes of travel when planning development layouts.
- 4.65. The policy seeks the provision of high-quality interchanges between walking and cycling and public transport to ensure longer distance journeys are an attractive and realistic alternative to the private car. This can be achieved on new settlements through the provision of mobility hubs of different scales across the development.

Policy LP28 Safeguarded Land for Future Key Infrastructure

- 4.66. The proposed Nene Valley Villages country park is included within the planned infrastructure table provided within Policy LP28. Whilst Homes England support this policy in principle, further work is required to agree site boundaries as per the response to Policy LP45. Consideration should also be given as to whether the Country Park should be regarded as "infrastructure" in the context of the wider plan, it may be more suitable to secure this via an additional / alternatively worded policy to clarify this point.

Policy LP31 Flood and Water Management

- 4.67. Policy LP31 assesses how development can manage flood risk, protect the water environment through suitable drainage controls, and ensure water is used efficiently through active design control measures.
- 4.68. The sewerage undertaker's records at the Nene Valley Villages confirm that there are no public combined/foul sewers within the site boundary. The site has limited risks of flooding from most sources and any residual flood risk will be managed and mitigated through a surface water drainage strategy. The proposed development will use SuDS to enhance and improve water quality, amenity and biodiversity.
- 4.69. In terms of the water efficiency aspect of Policy LP31, Homes England is supportive of the suggested text which requires new residential development to meet the Standard of 110 litres per person per day. The Nene Valley Villages will seek to incorporate measures to minimise water usage at all levels by embedding water conservation approaches to the masterplanning and landscape design work through measures such as rainwater harvesting within the SUDS and landscape management strategy for the site.

Policy LP35: New Open Space, Sports and Recreation Facilities

- 4.70. This policy highlights open space standards for development. Homes England welcome a document on the accessible natural greenspace standards for Peterborough which will set out more detail in terms of the specific standards for the authority when available. Without this information, it is difficult for representors to comment on the suitability of the policy and the anticipated requirements for new developments with regards to open space, sports and recreation facilities.
- 4.71. We do, however, recommend that these details are considered in more detail to address the strategic sites and their specific circumstances, as suggested in relation to Policy LP55: Nene Valley Villages. For example, at Nene Valley Villages, there is an opportunity to consider specifically how the network of public open spaces can integrate with the existing John Clare Countryside and Nene Valley parklands to enhance the public's accessibility to the wider countryside.

Policy LP36: Green Infrastructure

- 4.72. Policy LP36 is supportive of a landscape-led, evidence-based approach to green field sites and advocates the protection of existing linear features. The Nene Valley Villages will achieve this policy through a comprehensive Green Infrastructure Strategy that will take into account the existing Green Infrastructure and Biodiversity SPD, build on and enhance the established existing landscape network, and incorporate the site's blue-infrastructure into the landscape strategy so it positively contributes to the landscape.
- 4.73. Moreover, Homes England are supportive of paragraph 13.34 which sets out that it is important for new urban extensions and new settlements to have multi-functional green infrastructure as part of their design.

Policy LP38: Biodiversity and Geological Conservation

- 4.74. Homes England supports the intention of Policy LP38 and recognises both the importance and legal requirement for local plans to include biodiversity net gain targets and assessments. The 20% BNG requirement that the policy seeks to implement across the City region could be applied as an aspirational target to allow for flexibility to be incorporated within the policy.

Policy LP39: Nene Valley

- 4.75. Whilst the Nene Valley Villages sits to the north of the dedicated Nene Valley site, Homes England is supported of the objectives and directives of the policy to safeguard and enhance the landscape for recreation, nature conservation, heritage, cultural and amenity benefits.
- 4.76. Homes England would support further policy development to encourage integration of the new Nene Valley Villages Country Park into the wider Nene Park Master Plan as an opportunity to further enhance this strategic piece of high-value landscape amenity.

Policy LP41: Trees, Woodland and Hedgerows

- 4.77. Policy LP41 is supportive of a landscape-led, evidenced based approach. The Nene Valley Villages will prioritise the retention value of existing trees, woodland and hedgerow features to influence the detailed design, ensuring that future development proposals appropriately prioritise and maximise their retention. Where design proposals mean that we cannot retain tree features, then suitable compensation planting should be designed to promote the health and future growth potential of new tree stock.
- 4.78. The Nene Valley Villages will increase tree canopy cover and incorporate native tree and hedgerow planting in the development, where suitable using native species. Woodland planting will be informed by the GI and BNG strategy. The current site is largely open agricultural with a lack of woodland cover, buffer zones on hedgerows and woodland habitat could be targeted to create more joined up habitats, in a manner that is more responsive to the receiving local landscape character, and as consistent with the feedback received from the John Clare Countryside group and Wildlife Trust.
- 4.79. Part C of the policy requires proposals to include a minimum of 15% canopy cover, or at least a 10% increase in existing canopy cover (whichever is greatest). Whilst this is a positive aspiration for the policy to apply, there should be an acknowledgement that this may not always represent the best use of space to provide maximum ecological benefits.
- 4.80. Clearly, the Urban Tree Canopy Standard is applicable for built-up areas but should not be applied in the same way to areas of open space where different space priorities may discourage tree-planting (e.g. for sports provision, meeting landscape character objectives, or to encourage different habitat typologies). The policy should, therefore, be reworded to clarify that the standard applies to on-plot development areas, and not entire red-line boundaries where large areas of open green space may be included.

Policy LP43: Landscape Character

- 4.81. Homes England welcome a landscape-led, evidence-based approach as outlined in Policy LP43. However, we suggest that 'proportionately' should be incorporated into the policy wording, ensuring that the policy robustly covers a variety of schemes at a range of scales.

Policy LP45: Country Park

- 4.82. Policy LP45 sets out that 135ha of Castor and Ailsworth will form a country park. Whilst Homes England is promoting an extensive new Country Park within the Nene Valley Villages proposals, we do not, however, recognise the 135ha figure referenced. The area of land identified within the Policies map for a new Country Park equates to 129ha.
- 4.83. The difference between our draft Ambition Statement and the draft Policies map is mainly around the extent of the proposed country park between Village 2 and 3. Village 3 within our Ambition proposal is slightly larger to accommodate the proposed employment land in this area which can be provided for within the identified buffer zones of the gas pipeline.

- 4.84. Notwithstanding this difference, the wider area identified for Country Park will remain as open space to positively contribute to the purposes and objectives of the Country Park as multi-functional green infrastructure to support nature recovery whilst also providing high-quality recreational space for the community to enjoy.

Policy LP62: Employment Allocations

- 4.85. Sites that are allocated for employment uses are highlighted within Policy LP62. Homes England welcome 7ha of the employment allocations being located at Land North of Castor and Ailsworth within villages 1-3. Village 4 provides an opportunity to significantly increase the plan-period employment provision and we would welcome this being included within the Local Plan to ensure the Council's employment strategy is as robust as possible in supporting the growth aspirations of the City and the wider region.

Map 4 Key Diagram

- 4.86. Overall, Homes England are strongly supportive of the identification of Castor and Ailsworth as a new settlement on Map 4 Key Diagram. The "proposed new parks" label does, however, extend beyond the area currently identified for new public parks within the Nene Valley Villages and we recommend that these areas are removed from the proposed plan as "new parks". This is dealt with in more detail in our response above to Policy LP45 – Country Park.
- 4.87. The diagram should include existing strategic parks to show how new parkland can help support the existing network across the Peterborough City boundary. For example, this would show the existing Nene Valley parkland to the south of Castor and how the proposed new parks around the Nene Valley Villages development could support and enhance the existing facility.

5. Summary

- 5.1. Homes England supports the Draft Peterborough Local Plan, and the inclusion of Land North East of Castor and Ailsworth as a strategic site allocation.
- 5.2. A number of clarifications have been suggested that will aid with the effectiveness of the Plan and the proposed changes suggested will help ensure that the Draft Peterborough Local Plan provides further clarity on how policies will be applied to future development proposals.
- 5.3. Based on Homes England's own extensive development experience, together with evidence developed by the WSP and Fabrik team, the Nene Valley Villages is a suitable, available and deliverable site that would meet the tests of soundness within Paragraph 36 of the NPPF.
- 5.4. The site is suitable as a long-term strategic growth opportunity for Peterborough. The Villages are relatively unconstrained and of sufficient scale to provide a highly sustainable new community that could support the proposed population as well as complementing existing needs.
- 5.5. The site is available for delivery, as it is exclusively within the ownership of Homes England who have the expertise and desire to facilitate the creation of this exciting new community for Peterborough.
- 5.6. The site is achievable. Capacity and technical testing has been undertaken demonstrating how it could provide approximately 3,000 homes, over 7ha of employment space with additional capacity for approximately 1,225 additional homes including potential early delivery in the Plan period.
- 5.7. The site is deliverable. Key infrastructure requirements have been identified with potential solutions already identified and initially costed to demonstrate that they would not create a barrier to the scheme's delivery.
- 5.8. We trust these representations will be given consideration. We confirm that we wish in due course to participate in the relevant sessions at the Examination in Public and make further representations as appropriate.

Appendix 1 – Additional Opportunities at Nene Valley Villages

The supporting draft Ambition Statement identifies two additional potential development sites that could be delivered as part of Homes England's Nene Valley Villages opportunities.

Land west of Ailsworth

The additional land in the vicinity of the Nene Valley Villages presents opportunities for additional growth to meet shorter term housing needs.

In this context, there is a further opportunity for a smaller village extension proposal on a parcel of land to the west of Ailsworth, that sits within the allocation boundary that could support the early delivery of up to 250 homes.



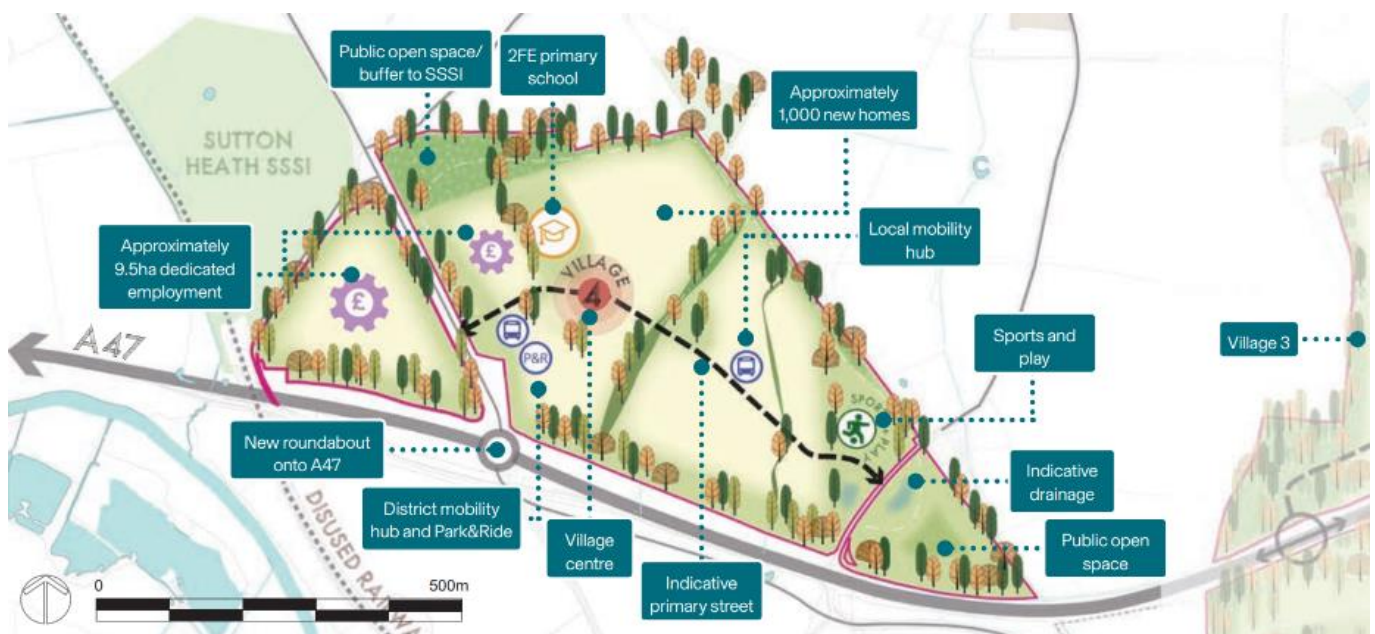
This is a relatively unconstrained site that can come forward as part of a small-scale development. Accessed from the existing road network, the site could be delivered alongside the enabling infrastructure works for Villages 1 – 3 north of the A47 and therefore could be accelerated and make a meaningful contribution during the first five years of the Plan, helping the council with its five year housing land supply.

The site was previously part of the Call for Sites submission with information about its deliverability. If supported, further information can be provided to demonstrate how the site could come forward and contribute to the housing land supply of the early years of the plan.

Village 4

To the west of the current allocated site, an additional 68ha of land is within Homes England's ownership and is available, suitable and deliverable to provide a fourth village that can contribute to the wider ambitions of the Nene Valley Villages (site ref 2026a in the SHELAA).

Village 4 (which is not proposed for allocation in the Plan) presents an opportunity to deliver a further c.1,000 homes as part of a mixed-use scheme along with almost 10 ha of dedicated employment land. Our analysis of the Plan (see Section 4) indicates that the plan should be providing for a higher housing target to meet affordable housing and employment growth needs. Further to this, the actual housing land supply within the plan leaves very little buffer to the identified target. Village 4 is available and suitable for delivery and could come forward within the plan-period alongside the existing allocation to bolster the housing supply of the plan.



Alternatively, Village 4 could be viewed as a longer-term site to be delivered as part of the wider village network providing a longer-term vision for growth in accordance with Paragraph 22 of the NPPF.

Page 19 of the SHELAA (stage 2), site ref 2026a (Village 4 option) was also rejected, with justification stating:

'The site, when considered on its own, is in open countryside and is detached from any other settlement in the Peterborough area. Sufficient housing and employment land has been identified in more sustainable locations to meet the requirements of the Local Plan.'

The site was discounted as a growth option in the SHELAA as it was said to be isolated and detached from any other settlement and that sufficient housing and employment land had been identified elsewhere. If the adjoining Nene Valley Villages come forward as planned, then Village 4 would not be isolated and would contribute positively towards the village concept. The Village 4 site should not be

considered on its own ignoring the proposals in the plan, but should instead be considered in light of Villages 1-3. Moreover, as explained below, more land for development should be identified in the plan.

The Peterborough Landscape Sensitivity Assessment identified Sub-Area P3a (which covers Village 4) as scoring the lowest overall in terms of landscape value. Summary table included below to assist:

Criteria	Sensitivity Score P3a	Sensitivity Score P3b	Sensitivity Score P3c	Sensitivity Score P3d
Physical Character	Medium	Medium	Medium	Medium – High
Natural Character	Low – medium	Low – Medium	Medium	Medium
Perceptual and Scenic Qualities	Medium	Medium	Medium	Medium
Cultural and Historic Associations	Medium	Medium – High	Medium – High	Medium – High
Settlement Form and Edge	Medium – High	Medium	Medium	Medium
Views and Visual Character	Low – Medium	Medium – High	Medium – High	Medium
Landscape Value	Low – Medium	Medium	Medium	Medium - High
Visual Value	Low	Medium	Medium	Medium
Combined criteria – overall score	Medium	Medium	Medium	Medium - High

Village 4 could also deliver additional benefits that would support the vision and strategic objectives of the draft Local Plan, including a new strategic mobility hub that could take advantage of its proximity to the A1(M) corridor, potentially providing a park and ride facility that would serve the City Centre.

Furthermore, the strategic location of Village 4 provides excellent connectivity to the wider strategic road network to potentially diversify the employment offer with the potential for a logistics hub that contributes to the specific identified demand within the HENA (see also our comments on the wider employment strategic policies).

There is no landscape, visual, heritage or biodiversity justification provided for not including Village 4 as part of the allocation.

Village 4 presents an opportunity to enhance the draft Plan. Village 4 can be delivered as part of the composition of the Nene Valley Villages either to boost delivery within the plan-period or provide a longer-term vision for growth in the area. There are no technical reasons why Village 4 could not be delivered, and it is suitable and available now to provide increased housing and employment development within the plan-period.

Appendix 2 – Detailed Policy Response

LP7 – Health and Wellbeing	NVV Compliance
Development proposal should promote, support and enhance physical and mental health and well being. This will be achieved by:	The draft Ambition Document sets out key principles of the NVV, which includes easy access to nature, activity, play and sports and providing a cultural rich community. These are fundamental to the ethos and design of the scheme to ensure health and wellbeing of new and existing residents is prioritised.
a) Seeking development contributions to new or enhanced health facilities	The draft ambition statement includes the expectation that the NVVs would provide a new healthcare facility this will be developed and secured through the masterplanning for the site as required by Policy LP4.
b) Planning houses that reflect changes that occur over a lifetime.	A key aspect of the NVV is to ensure it is a place for all. This means a diverse mix of housing to serve the young and the old, as well as supporting facilities that provide suitable employment and leisure opportunities for a wide demographic. This can be secured through the submission documents, the Design Code and the S.106 (as required by Policy LP4).
c) Build homes that are easy to keep warm.	Through design coding and a detailed energy strategy secured at the Planning Application stage, the NVV will meet high standards of building efficiency.
d) Create or enhance the role of allotments, orchards, gardens and food markets.	The Green Infrastructure strategy can incorporate local food growing features to enhance community stewardship whilst delivering highly valued local amenities.
e) Facilitating participation in sport and physical activities through the internal and external layout of buildings and the site.	The development will incorporate significant amounts of indoor and outdoor sport to serve the new community and also offer an opportunity to provide the existing community with facilities where they may currently be deficiencies.
f) Ensuring access to open space, green infrastructure and nature, providing benefits for physical and mental health.	A key principle of the NVV is easy access to nature, through a nature-led approach. Residents would have easy access to recreational green spaces with a range of character, where nature can thrive and people can improve their understanding of the ecology, geography and history of the area. Existing natural assets would be retained and enhanced as part of the green/blue infrastructure

	strategy, promoting the protection and connection of habitats (e.g. meadow / woodland) and connecting with initiatives off-site, to contribute to landscape-scale nature recovery.
g) Provide walking and cycling infrastructure.	The draft Ambition Document sets out how active travel is to be prioritised providing a network of green spaces and safe streets for pedestrians and cyclists.
Developments of more the 500 homes will need to submit a Health Impact Assessment	This will be part of the NVV proposals and any adverse health impacts identified will be mitigated through the planning application process.
Proposals for new health care facilities should relate well to public transport facilities and walking and cycling routes.	The expectation is that the new health-care facility would be centrally located within the NVVs, in the most accessible parts of the site.

LP12 – Meeting Housing Needs	NVV Compliance
Developers are expected to provide housing that contributes to meeting the housing needs of the Peterborough housing market area, as identified in the latest Housing and Economic Needs Assessment and in any other appropriate local evidence.	Whilst still at an early stage, the ambition of the NVV is to deliver a diverse housing mix that meets the identified needs of area and provides high quality housing opportunities for all.
Seeking development contributions to new or enhanced health facilities	The draft ambition statement includes the expectation that the NVV would provide a new healthcare facility
On all development proposals of 20 dwellings or more, 5% of homes should meet Building Regulations Part M4(3)(2)(a) Wheelchair adaptable homes, a proportion of which should be made available for affordable housing to rent to assist with meeting the identified need on the Peterborough Homes Housing Register.	The Design Code and Outline Planning Application can be a tool to secure these standards.
For major development proposals, it should be set out how measures to meet the demands of an ageing population have been incorporated. Proposals will be refused which fail to demonstrate appropriate measures have been considered and incorporated, where it would appear to have been practical, likely viable and appropriate to have done so.	The ambition for NVV is to provide a diverse mix of housing and facilities that provide for all ages and wide population demographic. It is anticipated that the NVV will include a variety of retirement and care facilities.

LP6 – Climate Change	NVV Compliance
<u>Part A: Energy & Design</u> The Local Plan seeks to introduce new climate mitigation policies to reduce dependency on Fossil Fuels. These present new requirements for energy efficiency in buildings and for renewable energy generation in the region and show how the design of homes and buildings in Peterborough will reduce the regions impact and support the UK’s transition to net zero. The policy highlights that this will be achieved by implementing the requirements for development in Policies LP4, LP29, LP30, LP8, LP10 and LP31.	The ambition for NVV is to incorporate sustainability, resilience to climate change and adaptability at the core of its principles. The design will seek to help Peterborough achieve net-zero targets through the delivery of energy-efficient built form, implementation of an energy strategy that follows net-zero design principles and minimises energy demand through a variety of measures which could include fabric efficiency and rooftop solar PVs. The NVV will also incorporate the development of a water resource strategy to ensure a sustainable approach to water supply and use, alongside a robust SuDS strategy.
<u>Part B: Transport</u> The policy seeks to transition to a low carbon modal share through spatial strategies and transport policies that change lifestyles and reduce emissions. The policy highlights that this will be achieved through implementation of provisions set out in Policies LP1, LP2, LP3, LP4, LP5, LP25, LP26 & LP27.	The ambition of NVV is to include a comprehensive sustainable movement strategy which is vision-led and based on the Sustainable Travel Hierarchy. This will reduce the impact of new development the highway network as well as achieve a low carbon approach to travel. The NVV would focus on placemaking to maximise internalisation of trips and influencing travel behaviours. Internalising trips could be achieved through a variety of measures such as providing on-site community facilities, employment, education, mobility hubs and digital infrastructure favouring modal shift. The NVV would deliver significant provision of active travel links to improve accessibility and connectivity within and between neighbourhoods. A network of active travel routes would be provided to encourage pedestrian and cyclist permeability, and would connect to the wider active travel network off-site where possible.
<u>Part C: Natural Environment</u> The policy seeks to protect and create green and blue infrastructure, enhance Peterborough’s biodiversity,	NVV would adopt a nature-led approach, which includes the protection, retention, enhancement and celebration of nature at its core. NVV would seek to deliver robust

reduce climate risk and mitigate negative effects of climate change resulting from environmental degradation via the introduction of requirements in Policies LP31, LP24, LP38, LP41 & LP42.	green/blue infrastructure, an extensive nature recovery network, which would include abundant green spaces, woodlands, wetlands and biodiversity enhancements (achieving a biodiversity net-gain), protecting and connecting habitats and creating and reinstating a range of habitat typologies.
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LP8 – Design	NVV Compliance
Policy LP8 seeks to ensure proposals will positively contribute to the character and local distinctiveness of the landscape and townscape, which support diversity, equality, and access for all, and mitigate climate change.	The draft Ambition Document highlights that the key aspirations of the NVV is to deliver a considered approach to placemaking, creating homes for all. The draft Ambition Document also sets out that sustainability would be a key principle, implementing climate change resilience and adaptability in design.
<u>Part A. Context</u> i. Be based on a sound understanding of local patterns of development, including street plots and blocks, spaces between buildings and boundary treatments. ii. Relate well to the site building form, including size, scale, massing, density, details, materials and topography: including the retention of existing natural, historic and built assets and features that contribute positively to local character and distinctiveness. iii. Protect any important local views into, out of or through the site (see Policy LP32: The Historic Environment). iv. Ensure that any back land development (where one dwelling is built behind another) includes sufficient space to allow for an access road to the rear, the width of which may be determined by the status of any adjoining highway and will only	A key principle of the NVV is to respond to the intrinsic local character and historic pattern of local built form, achieving a high-quality architectural design. Design coding at the detailed planning application stage can be used to ensuring all phases of the development achieve this principle. As set out in the draft Ambition Document, the intention is for the NVV to be of high-quality design that respects the local landscape, character and existing historic features. Detailed characteristics such as scale, massing, density and materials will be secured via an Outline Planning Application and subsequent Reserved Matters Applications at the site. A Landscape and Visual Impact Assessment would be undertaken as part of any planning application at the site to understand impact on protected views. The detailed layouts of plots and formation of development within those plots will come forward at Reserved Matters stage, and will be controlled through appropriate design coding and in discussion with the Local Authority.

be acceptable if supported by a contextual analysis of the locality.	
Part B. Identity i. Use appropriate, high-quality materials which reinforce or enhance local distinctiveness, with consideration given to texture, colour, pattern and durability. ii. Contribute positively to the sense of place by achieving local character and distinctiveness throughout the buildings, streets, spaces, landscape and infrastructure combined. iii. Reflect or improve on the original architectural style of the local surroundings, or embrace opportunities for innovative design and new technologies which sympathetically complement or contrast with the local architectural style. iv. Not result in the visual or physical coalescence with any neighbouring settlement.	The draft Ambition Document sets out the NVV principle of achieving high-quality architectural style and design that respects the local character and distinctiveness. The appearance of development, layout of streetscape and type of materials will be determined as part of any detailed planning application/Reserved Matters at the site and controlled through appropriate design coding.
Part C. Built Form i. Make effective and efficient use of land that contributes to the achievement of compact, walkable neighbourhoods. ii. Be appropriate for its context and its future use in terms of its building types, street layout, development block type and size, siting, height, scale, massing, form, rhythm, plot widths, gaps between buildings, and the ratio of developed to undeveloped space both within a plot and within a scheme. iii. Achieve a density not only appropriate for its context but also taking into account its accessibility. iv. Future building extensions should be subservient to the host building.	The draft Ambition Document confirms the principle of the NVV to provide local neighbourhoods with a high level of accessibility for walking and wheeling, allowing access to day-to-day services on foot, bicycle or public transport. The built form would be based on the existing historic character of Ailsworth and Castor, whilst also respecting the landscape of the site. The details of this policy requirement would be controlled and approved through the Outline Planning Application process. The NVV would seek to deliver the allocated quantum of housing in a layout of densities that create sustainable, walkable neighbourhoods. The density of the scheme would be presented as part of an Outline Planning Application.

v. Have a layout and form that delivers efficient and adaptable homes in accordance with Policy LP12: Meeting Housing Needs.	The requirements for adaptable homes would be controlled by a Design Code and Outline Planning Application.
<u>Part D. Movement</u> i. Form part of a well-designed and connected travel network with consideration for all modes of transport, offering genuine choices for non-car travel and prioritising active travel and where relevant demonstrate this through evidence clearly showing connectivity for all modes and a hierarchy of routes. ii. Maximise pedestrian and cycle permeability and avoid barriers to movement through careful consideration of street layouts and access routes both within the site and in the wider context contributing to the delivery of walkable and cyclable neighbourhoods (see Policy LP25: Accessibility and Transport). iii. Maximise permeability and legibility for pedestrians and cyclists, and avoid barriers to movement, through careful consideration of street layouts and access routes that are attractive, accessible and easily recognisable.	The NVV will achieve a reduction on the reliance on private vehicular travel through integrating innovative solutions across the primary movement network, creating a connected, low-carbon, smart movement network between The Villages, Castor and Ailsworth, Peterborough and beyond. Opportunities will be taken to prioritise pedestrian, cycle and e-wheeler movements both on and off-site, further facilitated by two new non-vehicular bridges over the A47, ensuring accessible and safe crossing points for the entire community. Moreover, the wider green network of spaces and routes within and surrounding the Villages fosters a permeable network of local pedestrian movement. These landscaped spaces will encourage sustainable movement and facilitate health and wellbeing. The movement network will be supported by a series of multi-modal mobility hubs, situated at key nodes and combining public transport with car clubs, e-bike/scooter schemes, cycle parking, rapid charging points, cycle and e-vehicle repair, and other facilities to promote journeys by low carbon means.
<u>Part E. Nature</u> i. Incorporate and retain as far as possible existing natural features including hedgerows, trees, and waterbodies particularly where these features offer a valuable habitat to support biodiversity, aligned with policies in the Natural Environment chapter of the Local Plan. ii. Incorporate appropriate landscape and boundary treatments to ensure that the development can be satisfactorily assimilated into the	NVV would adopt a nature-led approach, which includes the protection, retention, enhancement and celebration of nature at its core. NVV would seek to deliver robust green/blue infrastructure, an extensive nature recovery network, which would include abundant green spaces, woodlands, wetlands and biodiversity enhancements (achieving a biodiversity net-gain), protecting and connecting habitats and creating and reinstating a range of habitat typologies. The NVV include the delivery of a Country Park as part of the development, to provide a

surrounding area, maximising opportunities to deliver biodiverse habitats and ecosystems and to strengthen wildlife corridors and green infrastructure networks, and helping to achieve wider goals for biodiversity net gain, climate change mitigation and adaptation and water management. iii. Be sufficiently green to help achieve wider goals for climate change mitigation and adaptation (see Policy LP29: Renewable Energy and Low Carbon Energy Infrastructure), to manage water, or support diverse ecosystems or deliver biodiversity net gain (see Policy LP38: Biodiversity and Geological Conservation).	significant opportunity for biodiversity habitat delivery and to contribute to the wider strategic open space network in the immediate area. The details and requirements for incorporation of nature into the design will be determined via the Outline Planning Application process at the site.
<u>Part F. Public Spaces</u> i. Ensure public places and buildings are accessible, safe and secure and will be easy to maintain with clear definition of public and private spaces. ii. Provide well designed new public realm, with appropriate landscaping (hard and soft), street furniture, opportunities for public art and opportunities to enhance biodiversity. iii. Offer a range of spaces available for the community to support a variety of activities and encourage social interaction, and where applicable form part of a hierarchy of space. iv. Be carefully planned and integrated into the wider community to ensure spaces feel safe and are safe through natural surveillance, being flanked by active uses and by promoting activity within the space. v. Maximise opportunities for delivering additional street trees or	Existing and proposed public spaces, in particular green spaces, will be connected by a clear pedestrian and cycle network. Flexibility in use of spaces will be sought to ensure a variety of uses at proposed public spaces and community facilities. It is the design intention to create centres for social interaction through inclusion local centres, open space, community facilities and encouraging exploration via a connected pedestrian/cycleway network. The layout of public realm and details of public spaces will be controlled via design coding and the Outline Planning Application process.

trees within the public realm (Policy LP41: Trees, Woodland and Hedgerows) and biodiversity gains through the creation of new habitats and the strengthening or extending wildlife corridors (Policy LP38 Biodiversity and Geological Conservation) and the green infrastructure network (Policy LP36: Green Infrastructure).	
<u>Part G. Uses</u> i. Create or contribute to a variety of complementary uses that meet the needs of the community. ii. Be compatible and cohesive with neighbouring land uses and where conflict occurs this must be limited, with adequate justification and where possible be mitigated. iii. Not result in adverse noise and vibration taking into account surrounding uses, nor result in adverse impacts upon air quality from odour, fumes, smoke, dust and other sources in accordance with Policy LP9: Amenity Provision.	The ambition of the NVV is to provide flexible community uses that complement existing community assets including a range of residential, cultural, recreational, retail and commercial amenities that are accessible to both new and existing residents. The NVV will seek to celebrate and supplement existing land uses and not compete with or detract from existing neighbourhoods. Assessments to ensure vitality and viability of neighbouring land uses would form part of an outline planning application, such as a Retail/Town Centre Impact Assessment to understand the NVV impact and how mitigate any. A Noise Impact Assessment and Air Quality Assessment would be undertaken as part of any Outline Planning Application to mitigate amenity or environmental impacts.
<u>Part H. Homes and Buildings</u> i. Provide well designed boundary treatments, that reflect the function and character of the development and its surroundings. ii. Provide homes with good quality internal environments for users, including Nationally Described Space Standards and adequate access to private, shared or public spaces. iii. Make the best use of site orientation, building form, layout, landscaping and materials to maximise natural light and heat, whilst avoiding internal overheating by providing passive cooling and	The ambition for the NVV is to be nature-led with soft edges as part of the extensive green/blue infrastructure network proposed as part of the development. Exact layouts and boundary treatments of development plots would be presented as part of Reserved Matters applications. Homes provided as part of the NVV would be high-quality irrespective of tenure with good private amenity space and access to a comprehensive network of public amenity space. The details and layouts of internal environments would be controlled by design coding and Reserved Matters Applications. The built form, layout, landscaping and materials would be considered at detailed

ventilation (Policy LP10: Energy Efficiency). iv. Minimise space heating and cooling demand and total energy demand by adopting a 'fabric first' approach to construction, with the addition of Air Source Heat Pumps into new homes (Policy LP10: Energy Efficiency). v. Aspire towards water neutrality by meeting high water efficiency standards of 110 litres per person per day and incorporating facilities to recycle, harvest and conserve water resources (Policy LP31: Flood and Water Management). vi. Be adaptable to changing needs of future occupants and be cost effective to run. vii. Not result in harm to people's amenity either within the proposed development or neighbouring it through overlooking, overshadowing, loss of light or increase in artificial light or glare (Policy LP9: Amenity Provision).	planning application stage, however would be informed in design via appropriate assessments to ensure appropriate ventilation and overheating strategies are considered. The NVV ambition is to approach energy efficiency through implementation of measures such as fabric efficiency and built form, as well as use of renewable/alternative forms of heating. The details of any energy strategy would be confirmed at the Outline Planning Application stage. Details of water supply and consumption would be confirmed via a Utilities Statement or similar water management strategy at the Outline Planning Application stage. Assessments of impact on amenity from overlooking, overshadowing or loss of light would be undertaken at the Outline Planning and Reserved Matters Application stage.
<u>Part I. Resources</u> i. Minimise the need for resources both in construction and operation of buildings and be easily adaptable to avoid unnecessary waste, whereby as much of the constructions is done offsite as possible using the Modern Methods of Construction (MMC) (Policy LP10: Energy Efficiency, Policy LP30: Embodied Carbon). ii. Use high quality materials which are not only suitable for the context but that are durable and resilient to impacts of climate change in accordance with the requirements of Policy LP10: Energy Efficiency and Policy LP30: Embodied Carbon.	Upfront embodied carbon targets will form part of the base design to support a planning application. These will be aligned with best practice as set out in the Net Zero Carbon Building Standard and related publications. The draft Ambition Document highlights that zero carbon and energy-positive technology will be a principle implemented to support the scheme, and as mentioned above measures such as fabric efficiency and sustainable development principles will form part of the scheme from the outset. The detail of the exact measures will form part of an Outline Planning Application and subsequent detailed planning applications.

Part J. Lifespan i. Are durable, flexible and adaptable over their planned lifespan, taking into account potential future social, economic, technological and environmental needs, through the structure, layout and design of buildings and places. ii. M4(2) and wheelchair homes or any replacement standards in accordance with Policy LP12: Meeting Housing Needs. iii. Encourage the creation of a sense of ownership for users and the wider community with a clear strategy for ongoing management and stewardship.	The draft Ambition Document highlights that a key principle to the NVV is to be future-fit. The design intention is to ensure the new community is flexible, with the ability to adapt over time to changing lifestyles. The Design Code and Outline Planning Application can be a tool to secure the M4(2) accessibility standards.
Development proposals will be expected to satisfy requirements of any adopted local design guides or design codes where relevant to the proposal.	It is expected that a design code or similar would be secured at Outline Planning Application stage. If any design codes or guidance are adopted in advance, the NVV will respond accordingly.

LP19 – University	NVV Compliance
Safeguards land to northwest of the Embankment area of Peterborough city centre for future phases, expansion and enabling of the ARU Peterborough university campus.	The NVV supports the vision for future expansion of the university. The NVV could help facilitate university growth through provision of flexible employment floorspace (including potential research & development uses), and housing and accommodation for students and staff.

LP29 – Renewable Energy and Low Carbon Energy Infrastructure	NVV Compliance
Part D: Decentralised Energy Networks and Combined Heat and Power In principle, the council will support the establishment of decentralised energy networks and CHP networks. Provided it is demonstrated that the network either has spare and wasted capacity or demonstrated that the energy in the decentralised network is sourced from renewable sources.	In developing an energy solution for the development renewable and low carbon sources of energy will be at its core. As with other developments, space heating and hot water needs can be met using heat pump led systems. This avoids the need for fossil fuel led systems to support any decentralised supply networks designed into the masterplan. An appropriate low-carbon energy strategy would be controlled via the Outline Planning Application process and subsequently the detailed design stage at Reserved Matters.

Any proposal for a new or extended CHP network will only be supported if the power source of such a network is renewable or very low carbon based.	
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LP30 – Embodied Carbon	NVV Compliance
<u>Part B: Upfront embodied carbon in new buildings</u> New major developments, major renovation and rebuild development proposals must set out what they have done to lower upfront embodied carbon below specific limits.	Upfront embodied carbon targets will form part of the base design. These will be aligned with best practice as set out in the Net Zero Carbon Building Standard and related publications. The draft Ambition Document highlights that zero carbon and energy-positive technology will be a principle implemented to support the scheme, and as mentioned above measures such as fabric efficiency and sustainable development principles will form part of the scheme from the outset. The detail of the exact measures will form part of an Outline Planning Application and subsequent detailed planning applications.
Upfront embodied carbon assessment will be required. The assessment methodology provided by the Net Zero Carbon Buildings Standard (section 5.1 and annex B) should be used. In line with the Pilot version of the Standard (September 2024), specific limits for upfront embodied carbon must be met.	An embodied carbon assessment would accompany any Outline Planning Application and subsequent detailed planning applications at the site.

LP32 – The Historic Environment	NVV Compliance
<u>Part A: Historic Environment</u> All new development must respect, and enhance or reinforce where appropriate, the local character and distinctiveness of the area in which it would be situated, particularly in areas of high heritage value. There will be particular emphasis on the following:	The draft Ambition Document states that respecting the historic landscape will be an integral part of design. The NVV would seek to protect and celebrate the line of the Roman Road and views of the Church of St Kyneburgh in Castor. It is an ambition to provide a heritage trail walking route within the scheme to link historical features within the local landscape.
i. A presumption against development that would unacceptably detract from important views of Peterborough Cathedral by virtue of its height, location, bulk or design.	A Landscape and Visual Impact Assessment would be undertaken as part of any planning application at the site to understand impact on protected views.
ii. The use of Conservation Area Appraisals and associated Management Plans to ensure the preservation and where possible	The ambition of the NVV is protect and celebrate the local character and heritage of the surrounding area. The Villages are proposed to be located north of the A47 to mitigate impact

enhancement of the special character or appearance of each of Peterborough's Conservation Areas.	on the adjacent conservation areas, with no development proposed within the designated conservation areas. A Heritage Statement would be prepared at Outline Planning Application stage assess the scheme's impact on the adjacent conservation areas.
iii. The protection of designated heritage assets and their settings.	The site does not contain any nationally designated (protected) heritage assets, such as scheduled monuments, listed buildings or registered parks and gardens. As stated above, the ambition of the NVV is to protect, enhance and celebrate local heritage assets. An assessment of the schemes impact on heritage assets and their setting would be undertaken at Outline Planning Application stage.
iv. The identification and protection of significant designated and non-designated heritage assets and their settings.	As stated above, the draft Ambition Document has highlighted the Roman Road and Church of St Kyneburgh as key heritage assets that are proposed to be celebrated as part of the NVV. Any impact on their settings will be assessed as part of a Heritage Statement at Outline Planning Application stage.
v. The avoidance of harm to the character and setting of Burghley Park, Milton Park, The Pearl Centre, Thorpe Park, and Peterborough Cathedral Precincts, and to the grounds and parkland associated with Bainton House, Ufford Hall, Walcot Hall and the Abbey Fields, Thorney	The NVV would not impact on any of these assets.
<u>Part B: Heritage Statements</u> All development proposals that would directly affect any heritage asset (whether designated or non-designated), including any contribution made by its setting, will need to be accompanied by a Heritage Statement which, as a minimum, should cover the following: i. Describe and assess the significance of the asset and its setting to determine its architectural, historic, artistic or archaeological interest. ii. identify the impact of the development on the special character of the	A Heritage Statement and Archaeological Assessment would be submitted as part of any planning application at the site. Early surveys are being undertaken to understand in detail the archaeological value of the site.

asset including the cumulative impact of incremental small-scale changes which may have as great an effect on the significance of a heritage asset as a larger scale development. iii. Provide a clear justification for the works, especially if these would harm the significance of the asset or its setting, so that the harm can be mitigated and weighed against public benefits. The level of detail required should be proportionate to the asset's importance and sufficient to understand the potential impact of the proposal on its significance and/or setting.	
<u>Part C: Impact on Heritage Assets</u> Unless it is explicitly demonstrated that the proposal meets the tests set out in the NPPF, planning permission will only be granted for development affecting a designated heritage asset where the impact of the proposal will not lead to substantial harm or loss of significance.	A Heritage Statement would be submitted at the Outline Planning Application stage which would present an assessment of the proposed development on the significance of any heritage assets. This would also inform the constraints to which the design would respond to ensure any impact are avoided or minimised and appropriate mitigation is put in place.
Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm will be weighed against the public benefits of the proposal, including securing its optimum viable use.	The NVV is proposed to deliver significant public benefit in the way of contributing to Peterborough's housing need, including affordable housing provision, employment, education, community facilities, strategic green infrastructure, and biodiversity net-gain. Any impact on surrounding heritage assets would be assessed as part of the overall planning balance.
<u>Part D: Archaeology</u> In the case of application sites which include, or could potentially include, heritage assets with archaeological interest, designated or non-designated, the council will require the developer to carry out a preliminary desk-based assessment. If this does not provide sufficient	Early site investigations and surveys are being undertaken to understand detailed archaeological constraints in addition to a preliminary desk-based assessment. Any assessments and reporting would be presented as part of any planning application at the site.

information, developers will be required to undertake a programme of field evaluations.	
Wherever possible and appropriate, mitigation strategies should ensure the preservation of archaeological remains in-situ. Where this is either not possible or not desirable, provision must be made for preservation by record according to an agreed written scheme of investigation submitted by the developer and approved by the planning authority.	Appropriate mitigation and written scheme of investigation would be controlled and agreed with the planning authority through the Outline Planning Application process.

LP53 – Urban Extensions and New Settlements	NVV Compliance
The policy allocates Land North East of Ailsworth & Castor for an indicative 3,000 homes with 1,800 homes delivered in the Plan Period 2024 to 2044.	The principle of the allocation is supported, however the ambition for NVV is to accelerate delivery. As such, the delivery of NVV has sought to maintain flexibility to present an opportunity for accelerate delivery, through additional land identified in Appendix 1. Accelerated development could be facilitated and supplemented with early delivery of biodiversity enhancements and proportionate infrastructure. It is therefore reasonable to assume the NVV could delivery significantly more than 1,800 homes in the Plan Period, which should be reflected in policy.