THORNEY PARISH COUNCIL

OBJECTION TO REG 19 SUBMISSION DRAFT PETERBOROUGH LOCAL PLAN 2026

SPECIFICALLY:

a) **Policy LP60 which identifies land at, Thornberry Lodge, as being allocated for 38 Gypsy and Traveller pitches**
b) **The Proposal Map which identified the above allocation under reference LP60.1**

1.0 INTRODUCTION

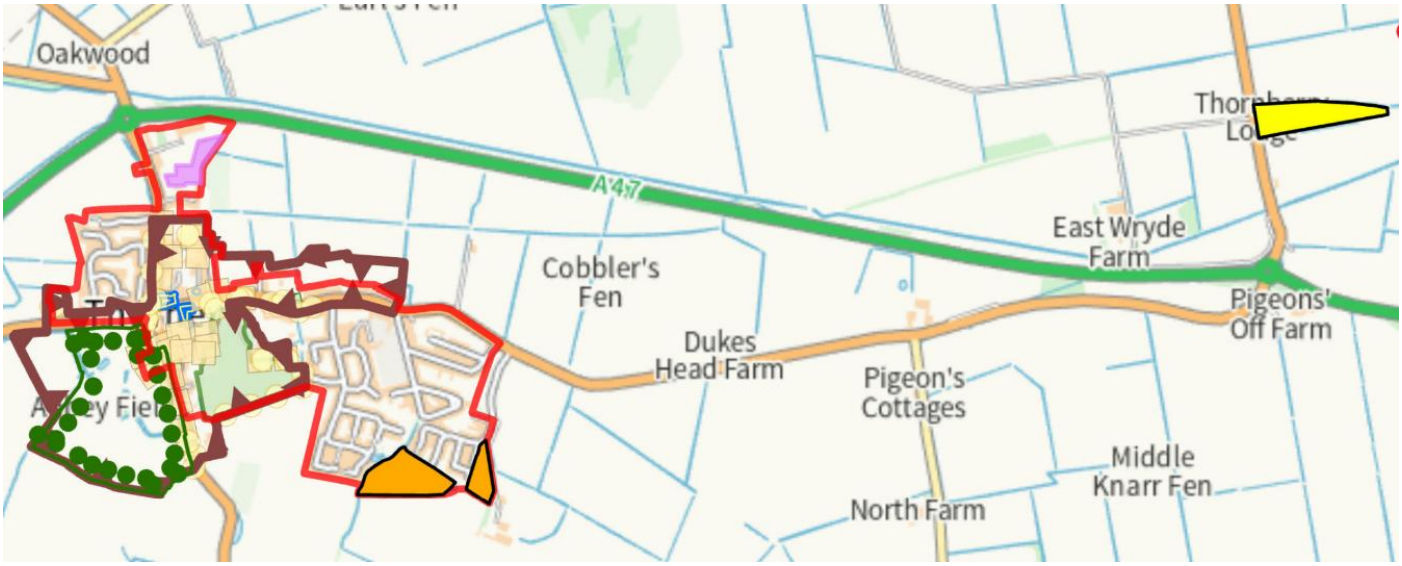
1.1 Policy LP60 to which the Parish Council objects is reproduced below:

Policy LP60: Gypsies and Travellers and Travelling Showpeople sites

The following site, as identified on the Policies Map, is allocated primarily for Gypsies and Travellers:

Site Ref.	Site Address	Area (ha)	Indicative/ outstanding Dwelling	Site Specific Requirements
LP60.1	Thornberry Lodge	2.9	38	Any planning application must be supported by a site-specific flood risk assessment.
LP60.2	5 Royce Road	0.2	5	
Total				**43**

1.2 Below is the allocation (in yellow) as shown on the proposal map to the draft Local Plan with the village of Thorney shown for context:



Gypsy and traveller site allocations

3.0 REASONS FOR OBJECTION

The Location of the Allocation Conflicts with the Spatial Strategy

3.1 The special strategy to the Draft Local Plan is set out in Primary Evidence Document PE011b "A strategy for Accommodating Growth – An evidence document on support of Policy LP2".

3.2 Meeting the housing needs of the gipsy and traveller community forms an integral part of meeting the housing needs of the city. Meeting the housing needs of gipsys and travellers is not referenced in the document as being excluded from the scope of the strategy document. Therefore, the allocation of sites to meet that community's needs must be subject to it. Table 10 of the "Strategy for Accommodating Growth" sets out the distribution of growth within the City area in geographic terms.

Table 10 Draft Local Plan Spatial Startegy

Location	Approximate percentage of growth
Urban Area of Peterborough	19%
Urban Extensions to Peterborough	50%
New Settlements	13%
Villages	6%
Windfall	11%
Total	100%

3.3 As can be seen from the above table, the only development being planned for outside of settlements or new settlements is windfall development. As Thornberry Lodge is a proposed allocation, by default, it cannot be classed as a "windfall" type of development. If is therefore clear that the allocation of a site that meets housing need which is outside a settlement, not part of a new settlement and in the rural area is contrary to the spatial strategy of the Draft Plan.

3.4 In the light of the incompatibility of the allocation of the site at Thornberry Lodge with the Spatial Strategy, the allocation should be removed from the Plan.

The Proposed Allocation Performs Poorly in the Council's Own Sustainability Appraisal

3.5 The Council's own assessment of the sustainability of the site is set out in Core Document ref CD002 civ Sustainability Appraisal Report of the Peterborough Local Plan (Submission Version), October 2026 Appendix 2: Sustainability Appraisal of Preferred Site Allocations and Reasonable Alternatives Considered. The relevant part of the document is reproduced below. As can be seen the site only scores positively in relation to 2 of the 15 assessment criteria. One of those is by virtue of the site being proposed for gipsy and traveller use, which would be the same for any site identified anywhere in the city so perhaps can be disregarded. The other positive is in relation to the remediation of contaminated land. This positive is accepted. The Council has scored the site as "minor negative" in relation to health, integration and flood risk. The Parish Council considered that the "minor negative" score, significantly underplays the facts. With regard to health, the gipsy and traveller community are well known to have worse health outcomes compared to the general population. The location's poor access to health and wellbeing services and facilities will have a proportionately greater impact on the gipsy and traveller community compared to the general population. With regard to integration, the gipsy and traveller community generally have poor relationships with the settled community and the remoteness of the site will do nothing to address this at all. This status quo cannot be reasonably classed as being a "minor negative". Finally, with regard to flood risk, a "minor negative" score would be appropriate for general housing in a flood risk 3 location but given that the gipsy and traveller community generally reside in mobile homes and touring caravans they are more vulnerable and so a lower score would be appropriate.

G&T site 1

Site Ref:	G&T site 1	**Site Address:**	Thornberry Lodge, Thorney
Area (ha):	2.9	**Settlement Hierarchy Category:**	Open Countryside
Site Capacity:	20 (38) pitches	**Greenfield/Brownfield:**	Brownfield
Site Status:	Preferred site	**Policy Ref:**	LP60.1

SA Objectives	**Likely Effects**	**Commentary**
Social		
	+	It is expected that this site option would have a positive impact on this objective as it meeting the needs of specific groups i.e. Gypsies/travellers/travelling show people. However as the location is quite remote it is not a very accessible to services and facilities, hence only a minor positive impact is expected.
	-	This site option would have minor negative impact is expected against this SA objective as it is located in a remote rural area and has poor access to health and wellbeing services and facilities.
	-	This site option is located in a remote rural area which does not promote integration or social interaction, reducing isolation for particular groups (i.e. gypsies and travellers). Therefore this scores a minor negative impact on this SA Objective.
Economic		
	0	This site option would not impact upon this SA objective.

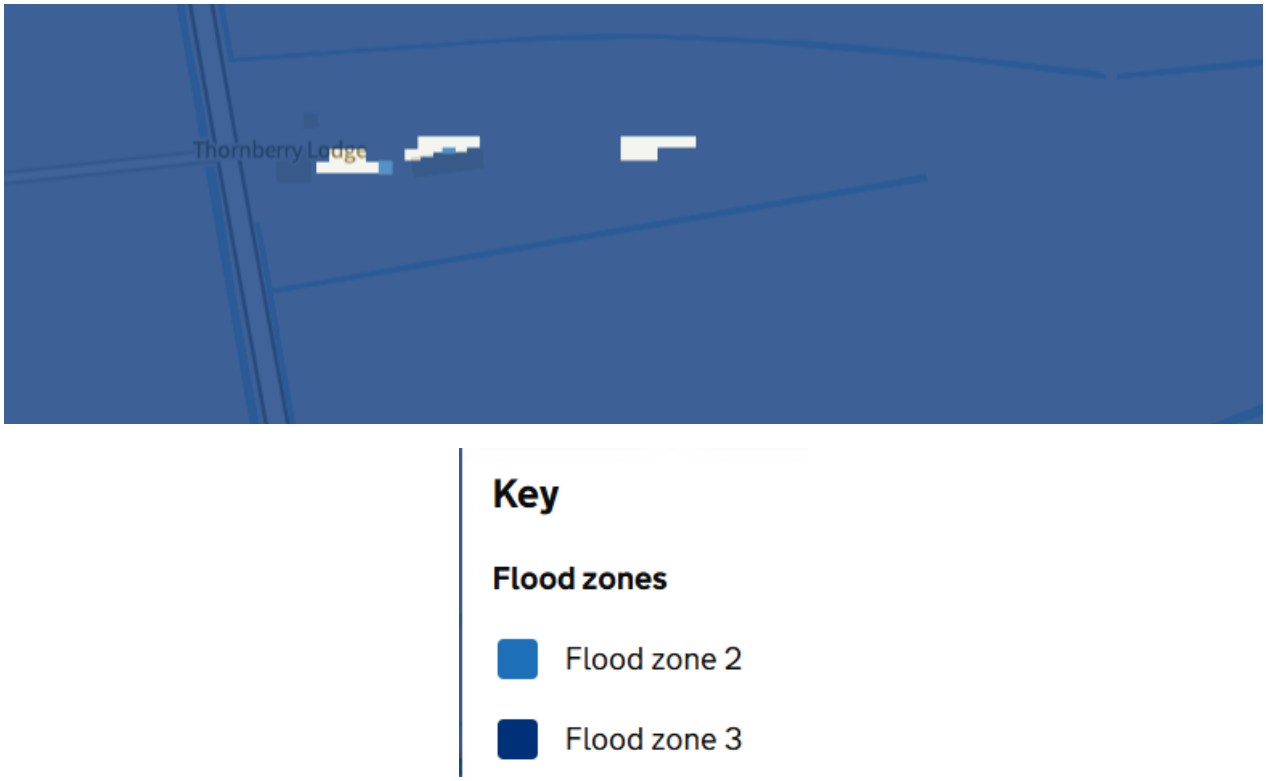
	0	This site option would not impact upon this SA objective.
Environment		
	-	This site option would be expected to deliver a minor negative impact, as much of the site is within Flood zone 3 and would therefore not direct a more vulnerable land use towards areas of lower risk.
	?	It is unclear what the impact this site option will have on this SA option.
	0	This site option would not impact upon this SA objective.
	?	It is unclear what impact this site option will have on this SA objective.
	0	This site option would not impact upon this SA objective.
	-	It is expected that this site option will have a minor negative impact on this SA objective as the site is remote from many services and facilities and there is little opportunity for safe and convenient active travel means to access Peterborough, meaning strong reliance on the private car still.
	-	A minor negative impact is expected for the site option as it is expected that there will be a reliance on the private car for journeys to access those services and facilities not available in the immediate vicinity.

	0	This site option would not impact upon this SA objective.
	+	It is expected that a positive impact can be achieved upon this SA objective as it would support the remediation of contaminated land.
	0	This site option would not impact upon this SA objective.
Conclusion	This site is located in a rather remote rural area. Positive effects are expected against all SA1 Housing and SA14 Land and Soils. and The site is expected to have minor negative impacts against SA2 Health and Wellbeing, SA3 Social Equality and Community, SA6 Climate Change Adaptation and Flood Risk, SA11 Sustainable Transport and Accessibility and SA12 Pollution.	

3.6 In conclusion the site allocation scores positively in only 2 of 15 criteria. Furthermore, in relation to three criteria, the site has not been assessed correctly and a more negative score should have been applied to the site. Sites which have been scored similar to the site at Thornberry Lodge e.g. site 2006 Paddock, west of Main Street, Southorpe have not been allocated on the basis of their poor sustainability score. Therefore, to allocate Thornberry Lodge would be inconsistent.

Flood Risk

3.7 The Council's October 2026 Site Allocations Sequential Test records that Thornberry Lodge is a 2.9-hectare site with only 13.7% in Flood Zone 1 and 86.3% in Flood Zone 3. Below is an extract from the Gov.uk Flood Risk Maps for Planning.



3.8 The Council's October 2026 Site Allocations Sequential Test states that the Sequential Test has not been passed and that the Exception Test is required. It also identifies likely infrastructure upgrades, contamination, flood-risk concerns and a nearby scheduled monument requiring appropriate consideration.

3.9 This is a fundamental concern, rather than a matter that can simply be deferred to a later planning application. Policy LP60.1 currently requires only a site-specific flood risk assessment at application stage. However, the allocation itself must first be justified at plan-making stage. The Council must demonstrate, before adoption, that the Exception Test is met and that the development would provide sustainability benefits outweighing flood risk, be safe for its lifetime, provide safe access and escape, and not increase flood risk elsewhere.

3.10 The occupiers of the proposed allocation will be at greater risk than general needs housing as the gipsy and traveller population tend to occupy mobile homes and touring caravans which are less resilient compared to bricks and mortar type construction. Given the flood risk at the site and the nature of development that would take place the allocation is contrary to National Planning Policy Guidance for Traveller Sites Policy B part 13 g.

3.11 In conclusion, it is inappropriate for the site to be allocated on flood risk grounds especially so due to the nature of the more vulnerable development involved.

Distance from Services & Facilities

3.12 The village of Thorney has a range of services and facilities available, including:

- Primary School
- GP Surgery
- Public House
- Bus Stops

3.13 However, these are all some distance from the site at Thornbury Lodge.



To bus stop – 3.1 km

To Duke of Bedford Primary school – 3.4 km

To GP Surgery – 3.7 km

To public house and village centre – 4 km

3.14 These distances are substantial and cannot realistically be walked or cycled. There would therefore be reliance on the private car. The location of the allocation cannot be considered sustainable.

Access To / From the Site

3.15 The B1167, from which the site is accessed, is a 60-mph unlit road with no footway. This makes it unsuitable for pedestrian or cycling use. To gain access to Thorney, the A47 must be crossed. Whilst the roundabout junction is lit, there are no crossing facilities for either pedestrians or cyclists. An unlit footway starts along the Wisbech Road some 0.8km from the roundabout junction on the A47. Therefore, the nearest footway to the site is some 1.3 km away. It is a further 1.6 km before any form of street lighting is available. From the A47 roundabout to the start of the streetlights on the edge of Thorney village is a 60 mph road. The following google images show the situation as described above.



Looking towards the A47 junction with the allocated site on the left



A47 roundabout junction looking towards Thorney



Wisbech Rd looking towards Thorney



Wisbech Rd, looking towards Thorney, where the roadside footway (unlit) commences



Commencement of the street lighting on the edge of Thorney

3.16 The lack of reasonable pedestrian and cycling facilities make the proposed allocation unsustainable from a transport perspective as there is no option other than to travel by private car.

Scale of the Proposal in Relation to the Settled Population of Thorney is Inappropriate

3.17 The scale of the proposal also remains inadequately justified. LP60.1 would provide 38 of the 43 pitches allocated to meet the identified residual five-year requirement. The Council must demonstrate why concentrating almost all of the requirement on one site in and around Thorney is appropriate, rather than considering smaller or more dispersed sites.

3.18 The site will have a population of c150 (each pitch having an average household size of 3.9). This means that the traveller population would make up nearly 9% of the population of Thorney. By comparison the traveller population makes up less than 0.2% of the national population. The proposal, given its scale, it would not be capable of integrating well with the settled community as required by National Planning Policy Guidance for Traveller Sites Policy, Policy B Part13 a.

The Allocation is Contrary to National Planning Policy Framework, Chapter 6: Delivering a sufficient supply of homes Policy HO12 part 1 a

3.19 The National Policy does allow for traveller sites to be located in places that are not well related to settlements but only where the proposal makes provision for occupants to both live and work at the site The scale of the proposed allocation at Thorney Lodge is such that either:

a) having occupiers both living and working at the site would not be appropriate due to the impact work operations would have on fellow occupants and /or

b) it is unlikely that there is scope for the majority of occupiers to be actually working at the site as well as living on it

(it should be noted that the NPPF refers to traveller businesses operation AT the site and not simply FROM the site as the Policy refers to omitting many travel to work journeys)

3.20 As the allocation is in the countryside it must meet the NPPF's live / work test. It is clear that this test will not be met and so the allocation is contrary to the NPPF.

The Allocation is Not Compliant with the Gipsy and Traveller Windfall Site Policy (LP16) in the Draft Local Plan

3.21 Draft Peterborough City Council Policy LP16 states that:

> "Planning permission will be granted for the development of land as a Gypsy and Traveller site, or a Travelling Show people site, if all of the following criteria can be met:
>
> I. The proposal must not conflict with other local or national policies relating to ecology, flood risk, contamination, landscape character, protection of the natural and built environment, heritage assets or agricultural land quality; and
>
> ii. The proposal must have adequate and safe vehicular access including for emergency vehicles, other large vehicles and towed loads likely to frequent the site; and
>
> iii. The proposal must have sufficient space for vehicle manoeuvring and parking within the site; and
>
> iv. The proposal must provide an acceptable standard of amenity for the site's occupants and must not have an unacceptable impact on the amenity of nearby residents (in accordance with Policy LP9; and
>
> v. The proposal should be adequately serviced, or capable of being adequately serviced, preferably by mains connections; and
>
> vi. The proposal should be located within reasonable travelling distance to both primary health care facilities and schools, preferably by walking, wheeling, cycling or public transport.
>
> The council will be prepared to grant permission for sites in the countryside (i.e. outside the urban area and village boundary) **provided that the above criteria (i) to (vi) are met**. "

3.22 The proposed allocation at Thorney Lodge is not in compliance with the above draft Policy as:

a) The site is at flood risk
b) The site is accessed via a 60-mph road that has seen numerous fatalities in recent years,
c) The site is located a considerable distance from services and facilities with the majority of the route being without a footway, unlit and alongside a 60-mph road with no bus service meaning that there is no option other than the private car.

The Allocation is Not Viable

3.23 The allocated site is brownfield in nature with its past and lawful use being a scrap yard. This use will have undoubtedly resulted in the site being contaminated and therefore remediation will be needed. Given the low values of the proposed gipsy and traveller use, there would be little prospect of the cost of remediation being able to be met. Therefore, the development is unlikely to be implemented as desired by the Council.

3.23 Given the physical size of the site i.e. over 0.2 hectares, the site will be subject to the Biodiversity Net Gain (BNG) Planning Regime. As can be seen from the Google image below, the site is almost completely covered in vegetation.



3.24 As the allocation is for 38 pitches, most of the vegetation will be lost to development and there is no realistic prospect of enough on site BNG provision being made. This would then require off site

purchase of off site BNG credits. Given the low value of gipsy and traveller development and the high cost of BNG provision / off site credits, there is little prospect of the development taking place.

3.25 In conclusion it has been shown that the allocation is not viable due to the contamination remediation costs and the cost of BNG provision. The site should, therefore not be allocated.

4.0 CONCLUSIONS

4.1 The proposed allocation at Thornberry Lodge should be removed from the Local Plan as:

a) The location of the site is incompatible with the spatial strategy in the draft plan
b) The site has a poor sustainability score according to the Council's own assessment and would score even worse if it was scored correctly
c) The site is contrary to the NPPF in that a site cannot deliver the live / work form of development which justifies a countryside location
d) The scale of the allocation would cause an imbalance in the makeup of the community
e) The allocation is located some distance away from the village of Thorney with no ability to access those facilities by means other than the private car
f) The site is in flood zone 3 (high risk) and it would be inappropriate for mobile homes and touring caravans to be on site as they would be insufficiently robust to withstand a flood event
g) The allocation is not viable due to the high site remediation costs and the high cost of BNG provision