Representation to Peterborough Proposed Submission Local Plan - Regulation 19

Policy/site: Policy LP60.1 - Thornberry Lodge, Thorney, proposed Gypsy and Traveller site
Thorney Parish Council object to the allocation of LP60.1, Thornberry Lodge, for 38 Gypsy and Traveller pitches.

This is not an objection to the provision of appropriate accommodation for Gypsy and Traveller families. The Council must plan positively to meet identified accommodation needs fairly and sustainably. However, the evidence now published demonstrates that Thornberry Lodge is not a suitable or deliverable allocation in its present form.

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. It 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.

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.

The October 2026 Sustainability Appraisal gives Thornberry Lodge negative scores for:

- health and wellbeing;
- social equality and community;
- climate-change adaptation and flood risk;
- sustainable transport and accessibility; and
- pollution.

These findings reinforce the concern that this is not a sustainable location for a large, permanent residential site. In particular, the appraisal's scoring framework indicates that the negative health score reflects distance beyond 1,600 metres from an NHS GP, while its transport criteria concern access to public transport and opportunities to connect to public rights of way. The Council should publish clear evidence that residents would have practical, safe and inclusive access to primary healthcare, schools, shops, public transport and open space.

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. This is especially important where the site faces serious flood-risk, contamination, heritage, access and infrastructure constraints.

The current National Planning Policy Framework requires a risk-based approach to development planning, taking account of climate change and all sources of flood risk. Its Sequential Test requires development to be directed to lower-risk locations where reasonably available suitable alternatives exist. For land in Flood Zones 2 or 3, the Exception Test requires clear evidence of wider sustainability benefits, safety for the development's lifetime, and no increase in flood risk elsewhere.

National policy on traveller sites also requires suitable access to frequently used services, including education, welfare and health services. It requires consideration of the safety and amenity of future occupiers and neighbouring residents. A site with 86.3% Flood Zone 3 coverage, where the Council identifies contamination, potential infrastructure upgrades and a nearby scheduled monument, requires far more detailed justification before it can properly be allocated.

I therefore request that Policy LP60.1 be found unsound and deleted unless, before submission, the Council publishes and consults on robust evidence demonstrating all of the following:

1. A plan-level Sequential and Exception Test, informed by the relevant Strategic Flood Risk Assessment and addressing current and future flood risk, climate change, safe access, escape and evacuation.
2. That no reasonably available lower-risk sites suitable for traveller accommodation exist.
3. The specific wider sustainability benefits that outweigh the very substantial flood risk.
4. A deliverable strategy for contamination investigation and remediation, infrastructure upgrades, drainage, utilities, access, emergency access and site management.
5. A heritage assessment showing that the nearby scheduled monument and its setting would be protected.
6. Evidence of safe, realistic access to healthcare, education, public transport, shops, open space and other day-to-day services.
7. Evidence that a 38-pitch site would be appropriate in scale, would not dominate the local community, and would not place undue pressure on local infrastructure.

If this evidence cannot be provided, the Council should remove LP60.1 and identify a lower-risk, genuinely sustainable alternative or a more appropriately distributed strategy for meeting need.

In addition to the above Peterborough City Council Policy LP16 states
Planning permission will be granted for the development of land as a Gypsy and Traveller site, or a Travelling Showpeople 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**.

Clearly this is not the case with this site, therefore, why include it as a potential when planning permission for development cannot be granted because

1. its adjacent to a high speed road that has seen numerous fatalities in recent years,
2. that children from this site would have to be bused to school,
3. there is no footpath,
4. no street lights,
5. no drainage,
6. the ground is contaminated by previous and present usage,
7. difficult access to health facilities and community access,
8. most of the site is in a flood risk zone 3.

From Peterborough City Council's own sequential test records Thornberry Lodge as 86.3% Flood Zone 3, says it fails the Sequential Test, requires the Exception Test, and identifies likely infrastructure upgrades, contamination, flood-risk concerns and a nearby scheduled monument. Its sustainability appraisal also gives LP60.1 negative scores for health, community access, flood risk, transport/accessibility and pollution.

National policy references

- National Planning Policy Framework (September 2026), policies F1, F2, F5, F6 and F7 - flood-risk evidence, the Sequential Test, Exception Test, safety and emergency access.
- National Planning Policy Framework (September 2026), policy HO12 - access to education, welfare and health services for traveller sites.
- National Planning Policy Framework (September 2026), policy PM11 - Local Plans must be justified, effective and consistent with national policy.