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23 February 2026

Dear Sirs

**REPRESENTATIONS IN OBJECTION TO THE ALLOCATION OF SITE 2093: LAND AT WEST WITTERING INTO THE EMERGING PETERBOROUGH LOCAL PLAN ON BEHALF OF THORNHAUGH PARISH COUNCIL**

Further to the Council's recent Local Plan Public Consultation on Land at West Wittering as an Alternative Site Option, I write on behalf of Thornhaugh Parish Council to strongly object to the allocation of this site.

The Alternative Site Option Consultation document January 2026 suggests that the allocation of the site could 'potentially replace the site currently identified at Land northeast of Castor and Ailsworth.' It considers an addition to draft Policy LP53: Urban Extensions and New Settlements, namely the addition of Land at west Wittering as a proposed new settlement, policy reference LP53.8a, with an indicative 3,000 dwellings (1,800 in the plan period). Draft Policy LP55a sets out the site-specific requirements.

The consultation document sets out that the reason for this reconsideration results from significant objections received to the allocation of the Caster and Ailsworth site in relation to impact on the natural environment and biodiversity, impacts and pressure on the local infrastructure, including highways and other services and facilities, and impacts on landscape.

We assume that the promoters of the Castor and Ailsworth site will continue to make representations as to why that site should remain proposed to be allocated and we do not intend to make comments on the benefits or otherwise of that site. Our purpose in making this representation is to explain why the allocation of West Wittering would be inappropriate in planning terms.

Objection in Principle to the Allocation of West Wittering

The site at West Wittering lies in an area of high heritage and landscape value. The site is part of the John Clare Countryside, and we note you have received an objection from the John Clare Countryside Partnership, which we support. The site lies in a heritage landscape and is also understood to be of high archaeological potential. At the very least a Landscape and Visual Impact Assessment should be undertaken before the site is considered for allocation, as well as a desk-based archaeological assessment. These may affect the developable area of the site which therefore needs to be understood sooner.

Additionally, the site is Grade 3 Agricultural Land, which is classified (along with Grades 1 and 2) as the Best and Most Versatile agricultural land. Its loss to development would remove current arable production land out of production and therefore be unsustainable.

Our other objections are covered in the responses to the elements of draft policy LP55a below:

#### Objection to Draft Policy LP55a

Before reviewing Policy LP55a, we have reviewed the list of objectives from section 2.1 of the **Evidence Site Profile** document on the Council's website at [PCC Planning Policy Public Data - 2093 Land at West Wittering.pdf - All Documents](#). This was completed mainly by the promoter and sets out their expectation for the site. The list of deliverables is as follows:

- 5,000 homes, including affordable homes and assisted living;
- 3 local centres, containing a health centre facility, shops, retail units, cafes and public space;
- 2 new primary schools, and 1 new secondary school;
- 16ha of employment;
- repurposing Grange Farm into a recreational hub, to help improve the physical health and mental well-being of the community;
- improved active travel and connectivity across the A1 and A47, by establishing new crossing points and upgrading existing footways/ cycleways;
- 3 mobility hubs with rapid bus services to Peterborough and Stamford, and electric bike/ scooter hire;
- aspirations for all homes to fall within a 15-minute neighbourhood concept;
- creation of a 45ha countryside park including sport pitches, allotments and orchards;
- establishing rich landscaped corridors to unite and enhance the habitats, resulting in substantial biodiversity net gain;
- and green and blue infrastructure covering almost half of the site, offering benefits to both people and wildlife.

Of note, the promoter assumed 5,000 houses, which was likely to have been calculated as being their 'critical mass' of development in terms of viability. The requirements of draft policy LP55a already have viability implications for a developer and if the Council is not proposing to allocate the full amount of housing requested, then it is even more likely that the scheme will be unviable unless some critical infrastructure is omitted from the list of site specific requirements.

In particular, if the development is found to be unviable, then the developer will look to reduce facilities, services and infrastructure from the scheme, making it unsustainable. The Council should satisfy itself that the development of a 3,000-home new settlement can be achieved viably with all policy requirements satisfied. The developer should be asked to provide a viability assessment prior to the site being considered for allocation. This is because the reduction from 5,000 homes will already not have been allowed for in the developer's scheme, and the eventual requirements of policy LP55a, as discussed below, are more likely to add to costs. A lack of control by the Council at this stage will simply provide a fallback position for a developer to rely on when proposing more development or fewer facilities, services or infrastructure in the future.

The first element of a scheme to be lost to viability arguments is affordable housing. If the scheme is unable to deliver affordable housing to the Council's standard, then the development will not provide a mixed and balanced community and will be unsustainable.

Viability concerns are also raised as follows in relation to the draft policy LP55a pertaining to the site's development (draft policy *in italics*, comments follow each point):

(Comments on the next 2 points are combined).

- *Provide safe and suitable access into the village of Wittering, via a new junction on the A1, that offers access southbound. This should be implemented before any housing is delivered.*
- *Provide a detailed transport strategy to mitigate any other adverse impacts on the national and local highway networks: to include a range of sustainable transport options – including the provision of improved public transport services to Peterborough and Stamford, and the delivery of safe and appropriate access points(s) on the A47.*

Unless the site developers intend using the improved access junction off the A1 to the village as their haul route and main access for early phases, there are no benefits to the developer in this up-front expense. On that basis it can be assumed that the new junction will be used for these purposes until new accesses from the south are provided.

Developers have to spend a lot of money up-front to get a site off the ground, often involving initial haul route access, archaeology, minerals extraction and drainage infrastructure. In this case the new access to Wittering village is in addition to the new access(es) for the site itself. All access off the A1 and A47 will be a significant cost and will also incur extensive delay in provision as the process to provide a new junction involves extensive survey, design, testing and safety considerations, with no guarantee that the proposed junction will be accepted. It is likely to be some years before the proposed new access junction to the site is provided and made available for use. The developer is likely to want to commence some of the earlier phases off other roads, which would then be required as both haul routes and occupier access. These other roads might be through the village, or via the A47 and Old Oundle Road. The village of Thornhaugh is also a potential cut-through in times of congestion on the A47 or simply for convenience.

Despite the wording of the policy to require a transport strategy, use of these routes from the A47 cannot be avoided and are indeed required. It is not clear from the policy whether any access to the site itself will be provided directly off the A1 (the allocation pink boundary line to the south of Wittering village does not allow for any corresponding safeguarded land on the east side of the A1 as has been allocated for the improved access into Wittering village. This would suggest that all but local access to the site is all intended to be via the A47 and Old Oundle Road to the west of the site, given that Wittering village is surrounded by designated habitat and the northern section of Old Oundle Road is not to modern standards for significant traffic levels.

It should be remembered that the A47 going eastwards from the A1 to the Sutton Roundabout was approved for upgrading to dual carriageway by the Highways Agency due to safety and traffic volumes concerns. Despite investment in preliminary studies and works, the project was abruptly cancelled in 2025. This does not mean that those safety and traffic issues no longer exist, and will be exacerbated by the proposed development. The A47 to the west of the A1 already suffers from peak-hours congestion.

The developer should therefore be required to provide a detailed transport assessment prior to consideration of the site for allocation, otherwise the traffic impact may render the development unsustainable.

- *Provide a high-quality foot/cycleway to the village of Wittering.*

No comments.

- *Provide a new community facility to serve new and existing residents of Wittering.*

Facilities and services are vital to the success of stand-alone new settlements. These all come at a cost to the developer, which will be factored into their viability. The policy is too vague in suggesting a single facility. For a stand-alone settlement of 3,000 homes, facilities will need to include community meeting spaces, sports provision (including changing and maintenance buildings as well as pitches and MUGAs), allotments, equipped play areas, skate park, burial ground, etc. The policy does not set out any detail of required facilities, which will have a cost and space implication. The lack of facilities will encourage residents to seek recreation in designated habitat areas, to the detriment of such habitats, or need to travel elsewhere, which would make the development unsustainable.

Space should also be provided for facilities that would normally be provided by the market, such as shops and other Class E uses. Investment will be needed by the developer to encourage the take up of commercial units, especially before the population is large enough to support them. This adds further costs to the viability of the development, but without shops, the site will not be sustainable.

- *Provide for new, early years, primary and secondary education provision.*

In terms of education there may need to be 3 primary schools based on experience with Cambourne in Cambridgeshire which was initially a 3,300 home new settlement. At Cambourne the demographic of residents took authorities by surprise, with news headlines confirming a birth rate higher than India's at the time (mid-2000s). This resulted in the need to use schools in nearby villages temporarily due to the S106 trigger points for provision not keeping up with demand, and the need for a fourth school (known as the Blue School) for some years whilst the demographic 'bulge' moved through time.

It is not clear from the online information whether the developers or planners are aware of the need for more than one primary school (and indeed early years settings), and how these can be accommodated on the site. The failure to provide the required school places will result in the development being unsustainable as children have to attend school elsewhere.

It is strongly recommended that the Council liaises with relevant counterparts at Cambridgeshire County Council Education department to fully understand the requirements and the associated costs to the developer, especially as the developer was assuming that only 2 primary schools would be needed for 5,000 homes and has calculated their viability on this basis.

At secondary level, there needs to be a critical mass of pupil numbers to justify a secondary school, as such schools tend to have a minimum size in terms of 'Forms of Entry' (e.g. a 5FE school would mean 5 classes of 30 in each year group). Without the critical mass, the education authority may not be able to provide a full curriculum and should therefore be consulted on the viability (in all senses) of secondary education on site. If this is not viable, then financial contributions in lieu of an actual school and the associated bussing pupils to schools elsewhere will be unsustainable.

- *Provide a suitable neighbourhood health facility to serve the community.*

Whilst this is vital, it is important to understand from the Primary Care Trust how they would see this being run. Simply providing a doctor's surgery building does not mean that doctors will be available to run it, as these facilities are run as commercial enterprises. If a facility is unlikely to be viable then the development will be unsustainable.

(Comments on the next 3 points are combined).

- *Provide a Country Park which will also act as a Suitable Alternative Natural Greenspace (SANG), together with arrangements for its long-term management and maintenance.*
- *Within the Country Park, develop an area of habitat with the specific purpose of reducing new negative impacts on designated sites and habitats of principal importance.*
- *The site should be designed sensitively around the adjacent designated sites and habitats of principal importance so that harmful negative impacts are mitigated – these are principally West, Abbot's & Lound Woods, Bonemills Hollow and Bedford Purlieus.*

No detail has been provided about the required extent of the country park in addition to the retention of existing habitat. In order to provide 10% Biodiversity Net Gain in addition to recreational space this could be a significant area and will all require long-term management. The Council should satisfy itself that the development can achieve the required net gain and still be viable. Due to the conflict between humans and biodiversity, the need to segregate parts of the Country Park for habitat creation is acknowledged, but a full biodiversity assessment should be sought from the developers before considering the site for allocation.

- *Flood risk and flood safety issues, as demonstrated by a Site-Specific Flood Risk Assessment and associated evidence and how on and off-site implications, will be addressed.*

It is understood that there are already water supply and sewage treatment capacity issues, which would need to be addressed by the developer and will therefore be an additional cost. The flood risk assessment should be provided prior to the Council's consideration of the site for allocation, as this may have geographic implications that would affect the developable area of the site.

- *The site must be designed in a way that avoids any development directly above the hazardous gas pipeline, consideration should be given to the relevant buffer zones around the pipeline and what would constitute appropriate development within these zones.*

The presence of the high pressure gas pipeline is a major constraint to the development of the site due to the required stand-off distance along its length. It will not be possible to build anything in the stand-off zone, and there will be restrictions on tree planting and no constructing roads that cross above the pipeline. This will effectively sterilize a large area of the site, thereby affecting the developable area. The Council will recall it has already rejected site 5011 Old Leicester Road, Wansford for being above the same pipeline.

- *Consideration must be made to any relevant future Minerals and Waste extraction proposals adjacent to the site and how the potential impact of this may need to be mitigated.*

The presence of minerals on a site of this size will inevitably lead to the requirement to extract the mineral prior to development taking place. The Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021 shows the whole site is covered by a Mineral Safeguarding Area for limestone. Policy 5 of the Minerals and Waste Local Plan does not require a consultation with the Mineral Planning Authority where a site has been allocated for development, implying that the Mineral Planning Authority has been included in the allocation process. It is important that this is the case. The lack of any minerals assessment at this stage means that it should be assumed there is viable mineral, the loss of which would be unsustainable. Therefore such assessment should be sought at this

stage as it has implications for the viability and deliverability of the development, as well as heritage, landscape and habitat implications.

- *Any development must ensure that there are no adverse impacts to ongoing operations at RAF Wittering and consideration must be given to the MOD safeguarding zone relating to development heights.*

The policy does not go far enough as it only relates to the height of any proposed new buildings. RAF Wittering has one of the longest military runways in the United Kingdom so is clearly a defence asset to be protected. At the very least, the Council should consult the MoD and understand the future aspirations for that site. If the use of RAF Wittering is to be able to increase in the future, for example with night-time flying, it would be unfortunate to have to be curtailed by noise complaints from new residents.

A noise assessment should be submitted prior to the site being considered for allocation, and should take into account the intentions for the future of the RAF station, which may well lead to the need to provide buffer distance from housing and/or the provision of design interventions such as higher acoustic protection to windows, and associated mechanical ventilation of rooms. This adds to the cost of dwellings and therefore affects the viability of the development.

### **Addendum to: Draft Peterborough Local Plan Sustainability Appraisal Report (April 2025) January 2026**

We have also reviewed the above document, where the comparative benefits of allocating (option 1) or not allocating the site (option 2) are discussed. Comments are made below on those SA Objectives which are suggested to have different outcomes under each option.

Under item 2 health and wellbeing, it is suggested that not having a requirement for a country park would result in reduced access to greenspace and leisure. However, this is incorrect as such facilities would be required even if the proposal came forward through the development management (planning application) process.

Under item 7 climate change mitigation, it is suggested that sustainable transport would not be achieved if there was no policy requirement for a foot/cycleway link to the existing village. This is not true because such linkages would be negotiated through the development managed process, being a typical requirement from overarching local plan policies.

Under item 8 biodiversity, geodiversity and green infrastructure, it is suggested that development without a policy to require the protection of existing habitats and the creation of new habitat could lead to major negative effects. This is not the case as negative effects would result in the refusal of planning permission.

Under item 11 sustainable transport and accessibility suggests that there would be a major negative effect if there was not a policy requirement relating to public transport, walking and cycling and the provision of a new access junction on the A1 and associated mitigation of impacts on the local highway network. However, all of these interventions would be required as a result of a transport assessment.

Under item 14 land and soils, it is acknowledged that the proposed allocation would have a negative effect, which would be exacerbated by not requiring a country park. However, a country park would be negotiated through the development management process.

Therefore, there is nothing to be gained from allocating the site just to impose site specific policies when the issues raised are covered by generic local plan policies. On the other hand, giving the site the status of being allocated would mean that there would be less

scrutiny under the Minerals and Waste Local Plan 2021, where Policy 5 imposes stricter requirements relating to the use of minerals prior to development rather than losing that natural asset.

## **Conclusion**

Thornhaugh Parish Council objects to the allocation of West Wittering as it will have significant negative impacts on the surrounding countryside landscape, agricultural production, protected wildlife areas and transport infrastructure. There is insufficient evidence that developing the site would not detrimentally impact archaeology, existing residents' amenity, or the successful operation of RAF Wittering.

It is also not clear whether all of the elements of a community can be accommodated on the site geographically, given the requirements for schools, biodiversity net gain, community facilities, open space, drainage infrastructure and stand-off distances from existing designated habitats and the high pressure gas pipeline.

Nor is it clear whether the development would be able to provide sufficient affordable housing, facilities and services to support a new community. Any impact on the viability of the scheme would result in important elements of a mixed and balanced community being lost, such that the development would not be sustainable.

The Council should not look to propose the site for allocation without significant supporting information to demonstrate that every aspect of a sustainable development would be delivered. Without a full viability assessment, the aspirations for the site are more likely to be watered down following its allocation.

We therefore strongly object to the allocation of West Wittering.

If you have any queries, please do not hesitate to contact me. I look forward to hearing from you regarding the next steps in the preparation of the Local Plan.

Yours sincerely

*Kate Wood*

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DIRECTOR**