



For and on behalf of  
**Stamford Property Company Ltd**

**Representations to the South Kesteven District Council Regulation 18 – Draft Local Plan  
2023-2043 Consultation**

**Proposed Housing and Mixed Use Allocations**

**Prepared by  
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## 1.0 INTRODUCTION

- 1.1 These representations have been prepared by **DLP Planning Ltd (DLP)** on behalf of our client, **Stamford Property Company Ltd**, in response to the South Kesteven District Council Regulation 18 Draft Local Plan 2023-2043 Consultation (Proposed Housing and Mixed Use Allocations).
- 1.2 Representations were made to the previous Regulation 18 consultation in April 2024, and this further consultation response should be read in conjunction with the previous representations that have been submitted.
- 1.3 The latest updated draft local plan explains that due to changes to how housing need is calculated, which were introduced in the December 2024 updated National Planning Policy Framework (NPPF), the annual housing need figure for the district has increased. As a result, the Council must identify additional housing sites to meet this higher requirement.
- 1.4 Whilst the latest updated draft local plan consultation focuses on housing and mixed use allocations, the previous version of the emerging Local Plan made it clear that Stamford, as one of the main market towns, is to provide for employment uses as well as residential allocations. However, no allocations have been specifically identified in this consultation document for employment / office uses.
- 1.5 From a review of the consultation documents, it would appear that the requirement to identify additional housing sites has come at the expense of employment land, and our client has significant concerns with this approach.
- 1.6 This response has been formulated on the following policies and documents:
  - Draft Site Assessment Report (July 2025)
  - Policy SKPR-266 (Stamford Gateway (Exeter Fields))
  - Sustainability Appraisal Report Addendum (July 2025)

## 2.0 REPRESENTATIONS

2.1 Whilst we note this particular consultation focuses on housing and mixed use allocation, we continue to strongly disagree that the emerging Plan seeks to provide a choice to the market in Stamford for both existing and new businesses and indeed is further constrained by proposed policy changes as part of this consultation and as discussed further below.

### **Draft Site Assessment Report (July 2025)**

#### ***SKPR-288 – Land east of Ryhall Road***

2.2 In our previous Reg 18 representations, we raised concerns that only one proposed employment allocation was proposed in Stamford for employment generating uses – land east of Ryhall Road (ref. SKPR-288).

2.3 We previously raised concerns that like Exeter Fields, this site is bound by residential allocations (now developed) to its northern and southern boundaries with no means of access proposed through either of those estates. We flagged that the only access available to this site is through an existing employment site to the immediate west and we understood that any access would therefore require third party land.

2.4 It is noted that in respect of SKPR-288 – Land east of Ryhall Road, Stamford that comments have now been received from Lincolnshire County Council acting as statutory consultee in respect of the impacts on the Highway Network. Their response states that *“subject to SKPR-282 being adoptable and not remaining private, the principle is acceptable. Explore connections onto adjacent sites for pedestrians”*. An amber rating is then provided to the question *“does the site have suitable access”* with the assessment identifying that only ‘part’ of the site has been identified to have suitable access off a local road/highway network. It is not clear how this conclusion has been reached when Lincolnshire County Council have identified that this is subject to SKPR-282 being adoptable and not remaining private and our previous concerns that access would be via third party land.

2.5 Our concerns therefore remain that this is not an accessible site without third party land and questions remain as to its deliverability.

2.6 The main findings conclude that the *“site has been modified to reflect the approval of retail application S20/0955 but allocation size remains the same”*. It is unclear what this means as application S20/0955 relates specifically to land further south of this site. Further clarification

is therefore required.

***SKPR-266 – Stamford Gateway***

- 2.7 It is not clear within the RAG assessment whether the Site has been considered for residential or mixed use. The Proposed Use is referred to as residential, with many of the comments focusing on the provision of 180 houses.
- 2.8 Further clarification is required and an updated assessment required based on the proposed policy of 5 hectares of residential uses and 5 hectares of employment generating uses.

**Draft Policy SKPR-266 - Stamford Gateway (Exter Fields) (Mixed Use)**

- 2.9 Our client strongly objects to the proposed mixed employment and residential allocation of this site. Whilst an element of employment use is now proposed on this site, concerns are expressed that the draft Plan does not adequately provide for employment needs in the district, and in particular, in Stamford.
- 2.10 The previous version of the Reg. 18 emerging Local Plan sets out that Stamford is to provide for high quality, modern office space and ancillary uses. Stamford is one of the most sustainable locations within the district to accommodate growth and there are significant concerns in relation to the lack of employment allocations, and the absence of evidence to justify the imbalance between employment and residential allocations.
- 2.11 Whilst Stamford Gateway (SKPR-266) is now proposed to be allocated for a mixed use including both residential and employment, there are significant concerns that insufficient employment land is being allocated within Stamford, and site SKPR-266 should be allocated entirely for employment uses.
- 2.12 This site is an existing local plan employment allocation (reference. ST.SE1).
- 2.13 We continue to query the outputs within the draft Site Assessment Report (2025) and the Employment Land Study (2024) which identify that the de-allocation of this site is on the basis that the site is unsuitable for employment use due to adjacent residential development. These constraints remain unchanged from the Employment Land Study (2015) which deemed part of the site suitable for employment use.
- 2.14 Whilst we note Policy SKPR-266 has been amended to include “5ha of employment generating uses” the proposed development principles do not expand on this further nor does

the policy specify what type of employment uses would be acceptable on the site.

- 2.15 We also note that there is a pending outline planning application (reference: S24/2198) which seeks permission for the following:

*“up to 268 residential dwellings (Use Class C3), up to 80 bed-care home (Use Class C2), local centre, and public open space with associated access, landscaping, drainage and infrastructure (access for approval only)”.*

- 2.16 Upon review of the parameters submitted with this planning application, a local centre area has been proposed to include use classes E, C2, C3 and Sui-generis with the supporting Design and Access Statement referring to a GP surgery, nursery, convenience store and care home along with residential apartments. The local centre area amounts to only 0.57 hectares of the total site area, significantly short of emerging policy expectations of 5 hectares. There is no indication that 5ha of employment uses will come forward on this site and how that might look in terms of offer and deliverability.
- 2.17 The proposed residential capacity applied for as part of this application also significantly varies to what the Council deem an acceptable density of 105 dwellings (at 35 dwellings per hectare).
- 2.18 Our client therefore has significant concerns about the provision of employment uses on this Site, particularly with an unjustified or clear evidence base to de-allocate the site for employment uses and lack of evidence to justify why only 5 hectares is appropriate and little support by way of the policy wording as to what uses would be deemed acceptable.
- 2.19 As presented, the amended policy wording continues to misalign with the overall strategy.

#### **Sustainability Appraisal Addendum (July 2025)**

- 2.20 Paragraph 5.72 of the Sustainability Appraisal Report Addendum (July 2025) states that the loss of employment sites is unavoidable if the Council is to meet the latest housing need figure. However, the de-allocation of Stamford Gateway (Exeter Fields) for employment generating uses is not consistent with the overall spatial strategy for job growth set out in the emerging local plan.
- 2.21 There also appears to be an error at paragraph 5.51 which makes no reference to the fact that draft policy SKPR-266 now includes 5ha of employment generating uses.



- 2.22 We also note that SKPR-55 is proposed to be deallocated for employment and allocated for residential use. Whilst this is within Towngate East, Market Deeping, this ultimately means that less land will be available to meet employment generating uses within the district and our client remains concerned that this conflicts with the overall strategy for growth.
- 2.23 It is not clear from the evidence base underpinning the draft local plan or the latest draft local plan 2023-2043 consultation document why the current employment allocation is not being carried through into the emerging local plan.
- 2.24 We therefore strongly object to the proposed mixed use allocation and the loss of employment on this site.

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