



**South Kesteven District Council Local Plan (2023-2043)
Regulation 18 Proposed Housing and Mixed-Use Site Allocations
Consultation Response Form
Thursday 3rd July until 11.59pm Thursday 28th August 2025**

This form has two parts:

Part A is for your personal details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make

Please fill in the response form using the format below. This will enable us to process your comments efficiently and effectively.

Respond by returning forms by:

Email: planningpolicy@southkesteven.gov.uk

Post: Planning Policy Team, South Kesteven District Council, Council Offices, The Picture House, St Catherine's road, Grantham, NG31 6TT.

The deadline for responses is 11.59pm on Thursday 28th August 2025.

All representations will be made publicly available and must be received by 11.59pm on Thursday 28th August 2025, otherwise your comments may not be taken into consideration.

The consultation documents, along with details of the consultation can be viewed on the South Kesteven District Council website - www.southkesteven.gov.uk/localplanreview

Reference hardcopies are available to view at the following addresses:

- Customer Service Centre (located next to the Savoy Cinema), The Picture House, St Catherine's Road, Grantham, NG31 6TT [Monday – Friday: 9am – 3pm]
- South Kesteven Community Point & Library, 3 Abbey Road, Bourne, PE10 9EF [Monday: 9am-5pm, Wednesday: 9am-6pm, Friday: 9am-1pm, Saturday: 9am-1pm]
- At libraries in Grantham, Stamford, Market Deeping, and Bourne during normal opening hours – www.lincolnshire.gov.uk/findalibrary

For more about the Local Plan visit the below webpage or use the QR code.

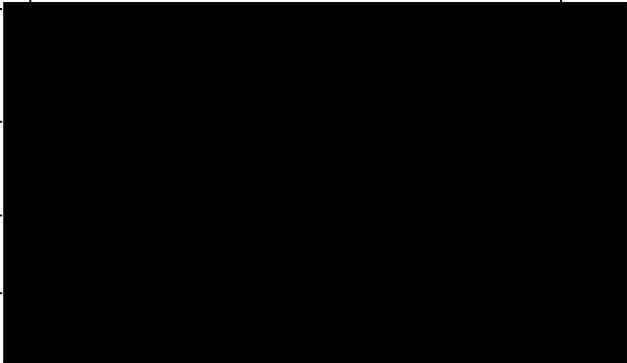
www.southkesteven.gov.uk/localplanreview

Should you have any queries then please contact the Planning Policy Team by emailing planningpolicy@southkesteven.gov.uk or calling 01476 406080.





Part A: Personal Details

	1. Personal Details	2. Agents Details (if applicable)
Title	Mr	Mr
First Name	Michael	Michael
Last Name	Dickinson	Braithwaite
Organisation		Robert Doughty Consultancy Limited
Address	c/o Agent	
Postcode		
Telephone		
Email Address		

Please note that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

4. Please Sign and date this form

Signature (please type for an electronic response)	Date
	5/08/2025



Please fill in a separate form for each site that you wish to comment on

Part B: Your response

Fields marked with an * must be completed

5. Site Reference*:	SKPR – 7 (Land to the South West of Raymond Mays Way, Bourne, PE10 0XX)	
6. Please indicate if you support, object or wish to provide comments only: *	Support	
	Object	x
	Comment	
7. Please provide your comments below:		
<p>We object to the process for allocating new sites promoted in the current Regulation 18 Consultation.</p> <p>Although new allocations have been drawn from sites already proposed through call for sites in previous stages of the Local Plan, it is unclear how the decision was made to allocate some sites and to leave other sites unallocated.</p> <p>The site assessment document was only put into the public domain on the first day of consultation. Members, when approving the consultation document, did not have any information to hand. Without providing any justification to members, the decision makers will have no way of knowing whether the proposal represents “an appropriate strategy, taking into account the reasonable alternatives, and based on appropriate evidence”. Without having any analysis, or evidence, Members will not have any idea whether the strategy, either in principle, or in relation to any specific allocation, is appropriate or whether another site represents a more appropriate alternative.</p> <p>In the specific case of SKPR-7, we note that the published document does not include any “Main Findings” and, as such, is missing out on any analysis or justification. How can a site for 270 new houses be promoted for development without any detailed analysis?</p> <p>We also note the proposed allocation is significantly smaller than the red line included in the Site Assessment report. No dialogue is provided as part of the consultation material to justify the change in site size and scale of development, or to assess the impact of the reduced site.</p> <p>When approving the draft plan for consultation, Members did not have access to any of the necessary information on which to base their decision. As such the plan, when considered at Committee, failed one of the key test of soundness: the information to allow a comparison of the various candidate allocations was not available. Even now key information and analysis is lacking from the site assessment exercise, without which it is not possible to comment in detail on the current consultation.</p>		



We note that the comments from Statutory Consultees in the site assessment form include some objections:

- Highways England are concerned about impact on the Strategic Road Network arising from the number of trips generated by SKPR-7.
- The Highway Authority are concerned about the limited means of access. Access is apparently not possible from the northern roundabout on West Road. Access would be from the southern roundabout at the junction with Musselburgh Way. The proposed allocation, however, does not reach as far as Musselburgh Way.
- The Highway Authority also consider the site has limited access to the Town Centre for sustainable modes of transport.

Other sites are preferable, in that they do not have the same level of concerns highlighted by statutory consultees.

SKPR-59 for instance, to the north of West Road has no objections in principle on Highways grounds and is considered to have better access to the town centre and will produce a lower number of vehicle movement on the Strategic Road Network. The land owner has provided evidence of how a number of access points can safely be provided to this site.

The only concern about SKPR-59 is the potential impact on Bourne Woods. A Preliminary Ecological Assessment has been provided as part of a previous site submission, which demonstrates the impact of development would be limited, and any residual impact could be mitigated by inclusion of a buffer zone. This information, however, does not appear to have been assessed through the Local Plan process. If it had, this concern would have been addressed.

The proposed allocation SKPR-7 is not accessible, will impact on the Strategic Road Network and will lead to a greater reliance on the private motor car. According to the published Site Assessment exercise there are preferable sites for allocation around Bourne.

We note that impact on the countryside setting of the Bourne is not a factor in either the Site Assessment or Sustainable Appraisal. We draw your attention, however, to recent appeal decision 3356615 for a retail development to the north of West Road. The appeal was dismissed because of impact on the open countryside. The impact of the retail development was not considered sufficient to outweigh the harm of the development.

We note the inspector for the recent planning appeal identified land to the south west of the Raymond Mays roundabout (now proposed as an allocation) as open countryside of equal value to the appeal site (see the last sentence of paragraph 5 of the appeal decision 3356615, which is attached). The impact of the appeal site was limited to views from around the roundabout to Raymond Mays Way. Site SKPR-7, however, will be visible from the roundabout, and the length of Raymond Mays Road, some further stretches of West Road and from the A612. SKPR-7, therefore, will have a more wide ranging impact on the open countryside and the setting of Bourne. Whereas the appeal was for a development of a retail store that would add variety and choice for the shoppers of Bourne, for which there was not a proven need, there is a proven need for residential development, and as such the land to the north of West Road is a preferable allocation to SKPR-7.

This choice was not presented to Members when they were being asked to approve the consultation document.

We object to the allocation of SKPR-7 in advance of other preferable candidate sites, such as SKPR-59.



We also object to the Site Allocation Process because of the failure to take account of objections lodged to the previous consultation exercise, and other material changes to national policy: Changes to these policies would influence the Site Assessment process.

Policies that impact site assessments, include Policy 2 : Agricultural Land Value and Policy 4: Biodiversity (as elaborated by Appendices 1 and 2 of the previous consultation that highlight the role of Biodiversity and Green Infrastructure Opportunity Areas).

Although a report of Officer responses to the representation has been published Members have not considered the report. The officer response highlights polices that may change, but does not provide detail of the potential changes.

The changes to the National Planning Policy Framework published in December 2024 and February 2025 change the emphasis to be given to Agricultural Land Value, and this may challenge the stringent approach to AGLV promoted by Policy 2 of the Draft Local Plan. If these policies change due to objections or changes in National Policy they weight given to these issues in a site assessment exercise may also change.

(continue on a separate sheet/expand box if necessary)

8. Your response on supporting documents	Sustainability Appraisal	x
	Habitat Regulation Assessment	

9. Please provide your comments below:

The SA only assesses the impact of sites included as proposed allocations in the draft Local Plan and fails to assess the reasonable alternatives. The process fails to include any assessment of rejected candidate sites and does not allow any conclusions about the relative merits of different allocation strategies, whether related to the choice of focusing on larger developments (contrary to the national priority to identify smaller housing sites to support local developers), ignoring the potential of smaller villages to meet the increased housing demand, or to allow for comparisons between specific sites.

(continue on a separate sheet/expand box if necessary)

Thank you for responding to this consultation