



Land West of Bourne Road, Thurlby

Representations to South Kesteven Local Plan
Regulation 18 Consultation

Boyer

Prepared on behalf of Land First | August 25

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1. INTRODUCTION

- 1.1 These representations have been prepared by Boyer on behalf of Land First in response to the South Kesteven Regulation 18 Proposed Housing and Mixed-Use Site Allocations Consultation.
- 1.2 Land First are promoting the Land West of Bourne Road, Thurlby ('the site'), which is approximately 7.23 Ha, for residential development with the capacity to deliver approximately 125 dwellings.

Local Planning Policy Context

- 1.3 South Kesteven District Council ('SKDC') adopted its 'Local Plan 2011-2036' in January 2020. The adopted Local Plan outlines the spatial strategy to meet development needs across the District of South Kesteven up to 2036. In April 2024, SKDC commenced preparations of their new Local Plan, including a review and an update to their evidence base documents, including housing and employment needs.
- 1.4 In December 2024, the Government published the revised NPPF which updated the housing requirements for local authorities. As a result of changes to the Standard Method, South Kesteven has seen an increase in the number of homes required from 701 dwellings per year (as originally set out in the April 2024 Draft Plan) to 886 dwellings per year. Therefore, in order for the Plan to be found sound and meet the higher housing requirement the Council is required to identify additional housing sites beyond those previously consulted upon.
- 1.5 SKDC have published their Regulation 18 Proposed Housing and Mixed-Use Site Allocations document for consultation in July 2025, which these representations respond to.

Structure of Representations

- 1.6 These representations are set within the context in which we seek to highlight, where relevant, the opportunities that are presented for the emerging Local Plan to consider the site at Land West of Bourne Road, Thurlby as a suitable additional housing site for allocation in the emerging Local Plan.
- 1.7 These representations are set out as per the following sections below:
- **Section 2:** Meeting Housing Needs
 - **Section 3:** Sustainability Appraisal
 - **Section 4:** Land West of Bourne Road, Thurlby
 - **Section 5:** Summary and Conclusions
- 1.8 We trust that our comments are of assistance to the Council in formulating an approach that is in accordance with Paragraph 36 of the National Planning Policy Framework ('NPPF') (December 2024). In order for the emerging Local Plan to be found 'sound' at examination it must be positively prepared, justified, effective and consistent with national policy.

2. MEETING HOUSING NEEDS

2.1 The following section of these representations considers the changes proposed by SKDC in relation to the revised housing requirement figure and meeting housing needs within the District.

Changes to Previous Housing Need

2.2 Previously, the Council have undertaken a Regulation 18 consultation in April 2024. Since the publication of this Consultation, there has been changes to the Standard Method for calculating housing need. As a consequence, the housing requirement for South Kesteven has increased from 701 dwellings per annum ('dpa') (as originally set out within the April 2024 Draft Plan) to 886 dpa. Within the 20-year plan period this equates to 17,720 dwellings, equating to an increase of 3,700 homes. As a result, South Kesteven do not have a sufficient housing supply due to the new standard method increasing the housing requirement which the emerging Local Plan must meet in full. Therefore, the Council must identify additional housing sites beyond those previously consulted upon in order to be found sound, meet the higher housing requirement, and comply with the NPPF.

2.3 We welcome the Council's approach to reconsider the proposed number of housing sites across the plan period in order to appropriately meet the requirements as stated within the NPPF. Further to this, we also welcome the consideration of the 2024 Affordability Ratio which saw a minor increase to the latest figure of 886 dpa for the District. It is considered that the Council have intended to meet this increased need through the identification of additional housing sites and through increasing the density of existing proposed allocations.

2.4 Increases to the existing capacity of proposed allocations have been informed by the Housing Density Study (July 2025) which indicated that density should be increased from 30 to 35 dwellings per hectare (dph) within the four main market towns. Density within all other settlement types remains at 30 dph. Whilst a higher density may be appropriate in towns, we consider that a lower density is more appropriate in villages and more rural settlement edge locations within the District. As a result of lower densities within these areas, this will reduce the number of houses that each site can provide. Therefore, we consider that in places where a lower density is considered suitable that further sites should be identified in order to achieve the housing needs of the District. This will assist in ensuring that the Plan delivers the housing requirement and does not face issues with under delivery by relying on fewer sites of a higher density, which will assist the Council in being able to demonstrate a sound plan at Examination.

2.5 Overall, it is anticipated by the Council that an increase in densities of existing draft allocations and the identification of 10 further sites for allocation will provide approximately a further 4,500 new homes to meet the shortfall within the District as a consequence of the new Standard Method and provision of a buffer.

2.6 We welcome the Council's identification of a further 10 sites for allocation to meet the increased housing need. However, we consider that further sites should be allocated in

sustainable locations such as Thurlby in order to ensure that there is increased flexibility and to ensure that the housing needs of the District can be fully met.

Plan Period

- 2.7 Previously, the plan period was proposed to start in 2021 and run until 2041. As part of this further Regulation 18 Consultation, the plan period has been updated to cover the period from 1st April 2023 to 1st April 2043. We welcome that the Council has amended the Plan Period to reflect a realistic Local Plan timescale that is still over a 20-year period. The updated Local Development Scheme (LDS) (February 2025) sets out the adoption of the emerging Local Plan is anticipated for November 2027.
- 2.8 Furthermore, whilst we welcome the Council amending the start and end date of the Plan, we consider that further considerations in relation to the start date of the Plan are needed. The current proposed start date of 2023 is now two years ago. Given delays to the preparation of the Plan due to the implications of the new Standard Method and the fact that the evidence base of the Local Plan was commissioned and published in 2024, we consider that the start date of the plan period should be brought forward to 2024 to align with the most up to date evidence base. In order to make the Plan sound in line with the revised NPPF, a realistic start and end date for the emerging Local Plan is required. Therefore, we recommend that the plan period should be amended to 2024 – 2044 to reflect the proposed 20-year plan period set out by the Council.

Plan Buffer

- 2.9 Within the further Regulation 18 Consultation, the Council outlined a Plan buffer of 11%, Paragraph 2.3 of the Consultation document indicates that this equates to a housing supply of 19,672 dwellings within the plan period.
- 2.10 The Plan buffer has been reduced from 21% in the April 2024 consultation to 11%. Whilst the 11% Plan buffer is in accordance with Paragraph 78 of the NPPF (December 2024), we question why this change has occurred. The Council have not provided any justification as to the reason why the Plan buffer has been decreased despite the previous consultation in April 2024 setting out that the 21% buffer would provide a greater choice of sites for housing. Whilst the Council have met the 2023 Housing Delivery Test requirement at 95%, the Council has consistently underdelivered below the new Standard Method requirement of 886 dpa over the last three years.
- 2.11 When accounting for the new Standard Method figure of 886 dpa within South Kesteven in relation to the houses delivered between 2020/2021 – 2022/23, this results in only 62% of housing needs being met. As per Footnote 8 of the NPPF, a presumption in favour of sustainable development would apply and an action plan and 20% buffer would be required.
- 2.12 Considering the above commentary, we consider that the Council should retain the 20% buffer to take into account implications of the new Standard Method housing figure. As a result, a 20% buffer would increase the overall housing supply figure to 21,264 homes within the plan period. This is an increase of 1,592 homes in comparison to the housing supply as a

result of a 11% Plan buffer. Such an approach would increase resilience into the Plan, ensure that future housing requirement increases are able to be addressed and look forward in an ambitious manner.

Proposed Housing Allocations

- 2.13 This section of these representations sets out a review of the delivery assumptions of several of the large strategic sites identified within the emerging Local Plan which we consider to not be deliverable under the timescales currently set out by the Council.

Policy SKPR-65: Prince William of Gloucester Barracks

- 2.14 The Prince William of Gloucester Barracks was identified as a proposed allocation within the Regulation 18 consultation in April 2024 which set out a plan for 4,000 new homes and 8 Ha of employment land. As part of this consultation, the number of new homes carried forward has been reduced to 3,000 with the 8 Ha of employment land being retained. The Council outlined that the reduction in homes was due to the need to further consider Biodiversity Net Gain requirements on site. Due to this reduction, only 1,890 dwellings are proposed to be provided within the plan period to 2043.
- 2.15 The Ministry of Defence (MoD) are proposing to vacate the Barracks in 2028¹. Despite this, the current geopolitical climate and current global unrest provides uncertainty as to whether the Barracks will close as scheduled or whether this will be retained for defence purposes. Further to this, Local MPs have lobbied to prevent the closure of the Barracks due to the current political climate and have indicated that more should be spent on defence due to current threats². As a result of this uncertainty, it is unclear if the site will come forward as a proposed allocation as anticipated.
- 2.16 Furthermore, it is still uncertain when delivery on site will commence due to a lack of information published from the MoD who are the site promoter. The Lichfield's Start to Finish Report (March 2024) demonstrates that for sites of 2000+ dwellings that the average time period from validation to completion of the first dwelling on site is 6.7 years, with sites of this size delivering an average of 150 dwellings per annum (dpa). When taking into consideration the brownfield nature of the site and current operational facilities, this could delay the start date on site and build out rates further.
- 2.17 When considering the above timescales, this would mean that the earliest start on site at 2034 would only contribute 1,350 dwellings within the plan period to 2043. Consequently, we consider the housing trajectory should be updated to amend the start date of the Barracks and to reduce the number of dwellings anticipated to be delivered within the plan period.

¹ Ministry of Defence (MoD), (2025), *Prince William of Gloucester Barracks, Grantham*, Available at: <https://princewilliamofgloucesterbarracks.co.uk/>

² Conservatives, (11th July 2025), *Column: Back my campaign to save Grantham's Prince William of Gloucester Barracks*, Available at: <https://www.garethdavies.co.uk/news/column-back-my-campaign-save-granthams-prince-william-gloucester-barracks>

Policy SKPR-278: Spitalgate Heath – Garden Village

- 2.18 The proposed allocation at Spitalgate Heath Garden Village will indicatively provide 3,700 dwellings and 11 Ha of employment land, with 1,512 of these dwellings anticipated to come forward within the plan period.
- 2.19 An outline planning application has been submitted in relation to Spitalgate Heath Garden Village since September 2014 (Ref: S14/2169). The application originally sought the delivery of 3,700 dwellings but was amended to 3,400 dwellings on 30th June 2025. As a result, there is a need for further information to be provided to fully assess the proposed development to accord with Regulation 22 of the Town and Country Planning Act (Environmental Impact Assessment). The Council has requested information to be submitted by 7th November 2025. Despite evidence that progress is being made on site, the update to supporting information raises questions about the start date of delivery on site.
- 2.20 Notwithstanding the above, the proposed Policy Part T text within the Consultation document demonstrates that the development is required to contribute to the delivery of the Grantham Southern Relief Road (GSRR) which will be facilitated by this road:
- “The development must contribute towards the delivery of the Grantham Southern Relief Road which facilitates this development and must contribute towards or deliver other offsite highways mitigation as identified through a site-specific Transport Assessment”*
- 2.21 The GSRR was originally anticipated to be completed in 2024/25 however a recent update from Lincolnshire County Council confirms the delay of the ‘bridge push’ which was originally scheduled for this summer due to delays in relation to design solutions. The update confirmed that once the ‘bridge push’ starts the road will be open approximately two years later³. This update therefore confirms at least a further three-year delay to the GSRR as well as an additional cost of between £10-20 million. Therefore, the uncertainty and continued delays to the GSRR puts into question the deliverability of this site and must be factored into the housing trajectory.
- 2.22 The Lichfield’s Start to Finish Report (March 2024) indicates that for a site of this scale (1,512 dwellings within the plan period) that the average timescale is 6.7 years from validation of the first application to the completion of the first dwelling. As a result, a realistic start date on site would not be until at least 2034/35. Notwithstanding this, the start date on site could be pushed back further if there are any more delays to the delivery of the GSRR. Similar to the above proposed allocation, the average build out rate for sites of 2000+ dwellings is 150 dpa as set out within the Lichfield’s Start to Finish Report (March 2024). As a result, only 1,500 dwellings would be delivered on the site by 2043; although this is only marginally lower than the anticipated 1,512 dwellings outlined in Policy SKPR-278 this is a best-case scenario which does not factor in any further delays surrounding the GSRR.

³ Lincolnshire County Council, (15th August 2025), *Progress update for Grantham Southern Relief*, Available at: <https://www.lincolnshire.gov.uk/news/article/2444/progress-update-for-grantham-southern-relief>

Additionally, the delivery of the number of dwellings may be reduced further due to the reduction of the overall site from 3,700 to 3,400 dwellings.

- 2.23 We consider that the GSRR will eventually come forward and the site will deliver housing. However, we consider that the current proposed trajectory of 1,512 homes is unrealistic and does not reflect the amended description of development. As a result, we consider that the site should be pushed back, and further housing allocations brought forward to address growth needs within South Kesteven in the short term.

Policy SKPR-323: Land north of Gorse Lane, Grantham and Policy SKPR-334: Land south of Gorse Lane

- 2.24 As part of the consultation, the Land north of Gorse Lane (SKPR-323) and Land south of Gorse Lane (SKPR-334) have been identified within the document as new proposed site allocations. The sites would cumulatively deliver 1,404 dwellings and 2 Ha of land for permanent Gypsy and Travellers and Travelling Showpeople pitch/plot provision. A comprehensive masterplan and agreed phasing across both sites are required as per the proposed policy within the Consultation document. As a result, considerations made within these representations have combined these sites.
- 2.25 Whilst proposed Policy SKPR-323 outlines the requirement for a Transport Assessment, Travel Plan, and Construction Management Plan to be produced and pro-rata contribution to be provided for the upgrade for Gorse Lane, this is not the case within proposed Policy SKPR-334. We consider that these requirements should be applied to both proposed Policies due to the sites being brought forward via a comprehensive masterplan.
- 2.26 Further to this, it is suggested through seeking highways improvements to Gorse Lane that access to the site will be provided here. However, it is still unclear where the proposed access points to the sites will be achieved from. We consider that Gorse Lane is not suitable to provide access for the number of dwellings proposed at this location. Gorse Lane is a country lane with no footpaths on either side of the road and a give way priority bridge over the A1. Moreover, it has not been confirmed as to whether a point of access is being sought from the GSRR located to the south of SKPR-334 or how this would provide onwards connectivity to SKPR-323.

Housing Trajectory

- 2.27 As per the above commentary in relation to the proposed housing allocations, we consider further revision of the housing trajectory is required. As it stands, the housing trajectory published by the Council is outlined at Figure 1 within the Consultation document. However, the housing trajectory is of a high level and is indicative for the plan period. The housing trajectory outlines that the majority of the housing allocations are proposed to come forward in 2030/31, with 1,400 dwellings to be provided in 2030/31. Nevertheless, from 2036/37 onwards it is anticipated that there will be an under delivery against the annual housing need. The Council are alternatively relying on over delivery in the earlier years of the Plan.

- 2.28 We consider that the indicative housing trajectory published by the Council does not provide a detailed breakdown of the anticipated delivery of housing in relation to each proposed housing allocation over the course of the plan period and the anticipated delivery of dwellings per annum. Therefore, we consider that the Council should undertake a fully informed assessment of the timescales of delivery for each proposed housing allocation so that a detailed housing trajectory can be produced. Once produced, the housing trajectory should be consulted upon and any additional allocation sites identified to ensure that no gaps in delivery arise.

Conclusions

- 2.29 Overall, we consider that the Council's emerging approach is not sound. We welcome that the Council have acknowledged the need to plan for a higher housing requirement due to the new Standard Method. However, we consider that a realistic start date to the Plan needs to be considered, along with retaining a 20% buffer to increase resilience, and producing a detailed breakdown of the housing trajectory and an assessment of the timescales for each allocation to come forward.
- 2.30 Furthermore, we do not consider that the Council's emerging approach is sound as further allocations are required in suitable Large Village locations such as Thurlby. Thurlby is a sustainable location and is suitable for further growth within the District. We consider that a balanced approach should be undertaken by the Council so that housing growth is spread across the identified settlement hierarchy. This will assist in the deliverability of the Plan through the provision of choice and competition in the market, will assist in supporting local services, and will support rural communities with new market and affordable housing.

3. SUSTAINABILITY APPRAISAL

3.1 The following section of these representations will review the Sustainability Appraisal (2024) prepared to support the Regulation 18 consultation (April 2024) and the Report Addendum (2025) which has been prepared to support this further Regulation 18 consultation.

Sustainability Appraisal Report Addendum

3.2 The Report Addendum (2025) to the Sustainability Appraisal (SA) forms part of the evidence base to the Regulation 18 Proposed Housing and Mixed-Use Site Allocations consultation. The Report Addendum should be read together with the SA previously prepared for the Regulation 18 consultation with occurred in April 2024.

3.3 The Report Addendum concentrates on the changes to the proposed housing and mixed-use allocations set out within the Draft Local Plan including key changes to proposed allocations and additional site options. It is noted that the Report Addendum does not assess those sites which have not been amended and previously assessed as part of the Regulation 18 consultation in April 2024. Moreover, the Report Addendum does not assess any new sites that are available for development.

3.4 Similar to the SA Report (2024), the Report Addendum reviews nine SA themes, with the effect of development being graded through a Red Amber Green (RAG) assessment, with dark red having the greatest negative impacts, and dark green having the greatest positive effect.

3.5 The site at Land West of Bourne Road, Thurlby (SKPR-149) has been assessed within the SA (2024) however has not been assessed within the Report Addendum due to no changes to the site occurring since the Regulation 18 consultation in April 2024. Table 3.1 below indicates the Council’s assessment of the site within the SA (2024) and Boyer’s assessment below.

Constraint	SKDC SA (2024) Assessment – SKPR-149	Boyer Assessment	Commentary
Air Quality			
Air Quality Management Area (AQMA)			The nearest AQMA is more than 15km away.
Biodiversity and Geodiversity			
Internationally Protected Sites			The nearest internationally protected site is approximately 2885m away in the form of a Special Area of Conservation (SAC).

Sites of Special Scientific Interest (SSSI)			The nearest SSSI is Math and Elsea Wood approximately 148m from the site. Although the site is located near to the SSSI, the proposed development could provide a nature park buffer which could safeguard and enhance important biodiversity features of the woodland as well as promoting wellbeing for local residents.
Local Geological Site			The nearest local geological site is Baston No. 2 Pit approximately 4117m from the site.
Regionally Important Geological Site			-
Local Wildlife Site			The nearest local wildlife site, Park Wood, Thurlby, is approximately 1537m from the site.
Local Nature Reserve			The nearest local nature reserve, Stanton's Pit, is located approximately 6200m from the site.
Ancient Woodland			The nearest ancient woodland, Math/Elsea Woods, is located approximately 150m from the site. The proposed development could provide a buffer to sufficiently mitigate against the impact to the ancient woodland.
Priority Habitat			The nearest priority habitat of deciduous woodland is located approximately 149m from the site.
Historic Environment			
Grade I Listed Building			The nearest Grade I listed building is located approximately 1216m from the site – Church of St Firmin. There are no Grade I listed building within the site boundary.
Grade II* Listed Building			The nearest Grade II* listed building is located approximately 1948m from the site – Red Hall. There are

			no Grade II* listed building within the site boundary.
Grade II Listed Building			The nearest Grade II listed building is located approximately 739m from the site – Bindon House. There are no Grade II listed building within the site boundary.
Scheduled Monument			The nearest Scheduled Monument is approximately 1770m from the site - Earthworks of Car Dyke in Park Wood. There is a Scheduled Monument 175m east of King Street (A15).
Conservation Area			The nearest Conservation Area is located approximately 1892m from the site – Bourne Conservation Area.
Registered Park and Garden			The nearest Registered Park and Garden is approximately 6010m from the site – Grimsthorpe Castle.
Landscape			
Tree Preservation Order (TPO)			The nearest TPO is 889m from the site – 239 – Thurlby Chapel Close. There are no TPOs within the site boundary.
Flood Zone			
Flood Zone 2			The site is located 146m from Flood Zone 2.
Flood Zone 3			The site is located 146m from Flood Zone 3.
Land, Soil, and Water Resources			
Agricultural Land Classification – Grade I			No overlap with Grade 1 Agricultural Land.
Agricultural Land Classification – Grade II			100% - Overlap with Grade 2 Agricultural Land.

Agricultural Land Classification – Grade III			No overlap with Grade 3 Agricultural Land.
Mineral Safeguarding Area			No overlap with a Mineral Safeguarding Area.
Mineral Consultation Area			No overlap with Mineral Consultation Area.
River			The nearest river is located 438m from the site.
Source Protection Zone			Direct overlap with Source Protection Zone 2/2c and/or 3.
Community Wellbeing			
Employment Site			The nearest employment site SKLP279 is 2138m from the site.
Primary Service – Shop			There are no shops within the site boundary, with the nearest shop, a Lidl store, located approximately 690m north of the site.
Primary Service – Primary School			There are no primary schools within the site boundary, with the nearest primary school located approximately 785m from the south of the site.
Primary Service – Secondary School/College			There are no secondary schools/colleges within the site boundary, with the nearest service located 1713m from the site.
Primary Service – Surgery			There are no surgeries within the site boundary, with the nearest surgery located 2357m from the site.
Town Centre			The nearest town centre of Bourne is located 2185m from the site.
Open Space			The Council consider the nearest open space is located 809m from the site - Crown Lane Recreation Ground. However, there is the Lawrance Park located 670m south

			of the site. Therefore the assessment has been adjusted.
Transportation			
Bus Route			Distance: 111m
Bus Stop			Distance: 220m. There are no bus stops within the site boundary.
Train Station			The nearest train station is 13,303m from the site. There are no train stations within the site boundary.
Public Right of Way (PRoW)			The nearest PRoW is 1m from the site - Fp Elsea Drive, Northorp.

Table 3.1 Assessment of SKPR-149 set out within the SKDC Sustainability Assessment (2024) and Boyers Assessment.

- 3.6 The above revised assessment confirms that the site at Land West of Bourne Road, Thurlby is a sustainable location for development within a Large Village. We consider that in order to effectively meet the housing needs within the District that the Council’s assessment should be expanded to cover additional options for growth within Larger Villages.
- 3.7 Moreover, we consider that the assessment should be informed by more recent data in order to ensure that the approach taken is robust. It is noted that the data was last updated previously 18 years ago, therefore this could potentially create gaps in the accuracy of data and could illustrate sites which are suitable as being unsuitable for development.

4. LAND WEST OF BOURNE ROAD, THURLBY

- 4.1 The Land West of Bourne Road, Thurlby ('the site') is approximately 7.23 Ha and is being promoted for residential development with the capacity to deliver approximately 125 dwellings (Appendix 1 and 2).

Site Characteristics and Context

- 4.2 Thurlby is located within the southern area of South Kesteven District and is currently identified as a Large Village by Policy SP2 'Settlement Hierarchy' within the adopted SKDC Local Plan. Thurlby has previously received one allocation for growth within the adopted Local Plan (Reference: LV-H12). The village of Thurlby is within proximity of two of the four key market towns, with Bourne to the north and Market Deeping to the south.
- 4.3 Thurlby is strategically located on the A15 route which runs from north-south across the District of South Kesteven. The A15 provides direct access from Market Deeping to Bourne and provides onwards travel to Lincoln in the north and Peterborough in the south. The settlement provides several services and facilities including a primary school, post office, a public house, a convenience store, a park, and two churches.
- 4.4 This site is a suitable, logical and sustainable choice for future growth within Thurlby and the District and should be recognised by SKDC as an additional proposed site that can contribute towards meeting the housing needs of the District.
- 4.5 The site presents an opportunity to provide up to 125 homes on the settlement edge of Thurlby adjacent to the existing pattern of development of the area. The site will be well designed and in keeping with the scale and character of Thurlby and will reinforce the natural 'C' shape of the village. Additionally, a range of affordable homes will be provided to meet local needs. The proposed access on the site will be gained directly from Bourne Road (A15), therefore reducing the impact on the settlement of Thurlby.
- 4.6 Furthermore, the proposed development on site will reinforce the ancient woodland SSSI to the north as a key green buffer between Bourne and Thurlby, with the provision of a buffer providing separation from the proposed development and the SSSI. As part of the proposed development, key design aspects include a green corridor, retaining and enhancing PRoW, and public open green space. Moreover, the change of the land to residential use has the potential to reduce adverse effects such as nutrient run off in regard to the ancient woodland (Appendix 3).

Summary

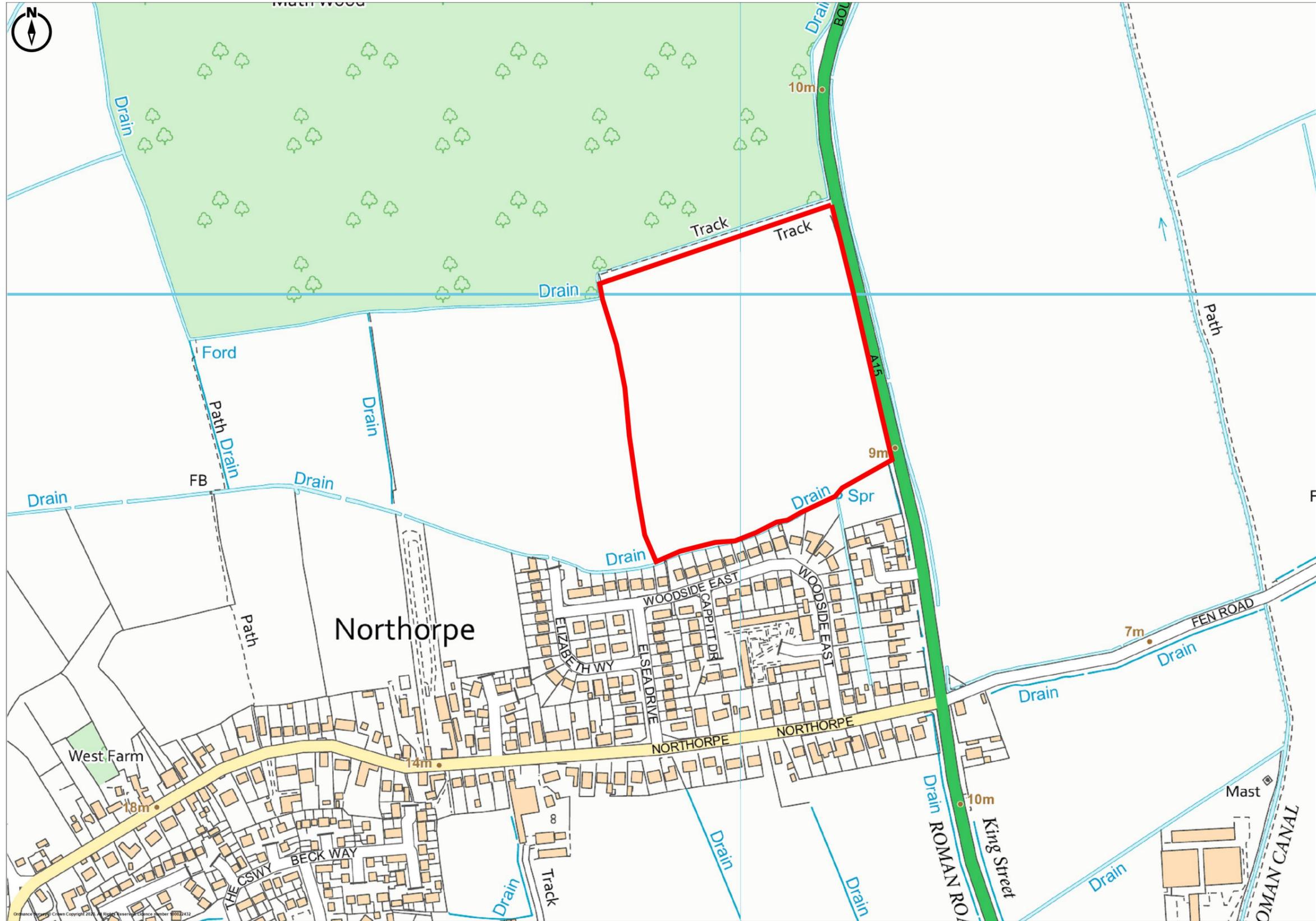
- 4.7 Taking the above into consideration, the site at Land West of Bourne Road, Thurlby is being brought forward by Land First and has the potential to deliver up to 125 dwellings in a suitable and sustainable location. Accordingly, the site is deliverable, suitable, and available to come forward to meet the housing needs of South Kesteven.

5. CONCLUSION

- 5.1 These representations have been prepared by Boyer on behalf of Land First in response to the South Kesteven District Council (SKDC) Regulation 18 Proposed Housing and Mixed-Use Site Allocations Consultation.
- 5.2 These representations are made in response to the Regulation 18 further consultation document and the emerging Local Plan in relation to the ongoing promotion of the Land West of Bourne Road, Thurlby ('the site'), for residential development of up to 125 dwellings. Enhancement to the PRoW will increase the sustainability of the site, and the change of the land to residential use has the potential to reduce adverse effects such as nutrient run off in regard to the ancient woodland.
- 5.3 The site is suitable, available, and deliverable for providing the required growth within the District within the early stages of the plan period upon adoption of the emerging Local Plan. We consider that the site is highly suitable for consideration as a proposed housing allocation.
- 5.4 The purpose of these representations is to assist SKDC in formulating an approach within the emerging Local Plan that is consistent with the National Planning Policy Framework (NPPF) (December 2024) and the tests of soundness.
- 5.5 With this in mind, our representations relate to the tests of soundness as per Paragraph 36 of the NPPF; namely, whether the emerging Local Plan is positively prepared, justified, effective, and consistent with national planning policy.
- 5.6 The approach undertaken by SKDC set out within the Local Plan Consultation document is not considered to be sound at this stage. Land First consider that the approach to housing need currently is not considered to be consistent with national planning policy, and is not effective, justified, or positively prepared. To rectify our client's concerns, further housing site allocations should be made by the Council in suitable, sustainable Large Village locations, such as Thurlby.
- 5.7 These representations have set out our recommendations to assist the SKDC in achieving an approach that is capable of being found sound as the emerging Local Plan progresses and which ensures that the housing needs of the District are met in a sustainable manner.

APPENDIX 1. – LOCATION PLAN

Land on the west side of Bourne Road, Thurlby



APPENDIX 2. – VISION DOCUMENT AND MASTERPLAN



Vision Document

Land on the west
side of Bourne
Road, Thurlby

2025

LANDFIRST

YOUR TRUSTED LAND PARTNER

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INTRODUCTION

Mosaic has prepared this Vision Document on behalf of Land First to support the development of Land on the west side of Bourne Road, Thurlby (the site), for around 117 much-needed new homes and parkland as part of the sustainable growth of Thurlby and Northorpe.

The document establishes that this is a highly sustainable site, capable of accommodating housing growth in a logical and contained manner. Further, it demonstrates that the site is deliverable, due to minimal constraints.

Our vision for the site aligns with the vision and objectives of the South Kesteven District Council Regulation 18 Draft Local Plan 2021–2041 and the Thurlby Parish Neighbourhood Development Plan, as well as the principles set out in Building for a Healthy Life and the Town and Country Planning Association's 20-Minute Neighbourhoods. The site presents an excellent opportunity to contribute to the future sustainable growth of Thurlby and Northorpe while delivering substantial benefits to the local community.

LANDFIRST

YOUR TRUSTED LAND PARTNER

Land First Investments are a family owned and operated Strategic Land Company, with a 25 Year Track Record of delivering homes to places that need it. We work alongside community stakeholders to provide new communities to that will leave a long-lasting positive impact on the towns and villages within which we work in. Our desire is to create high quality and individual new places for people to live, work and play. Within each of our developments, the design has always integrated the wider landscape and nature of the site.

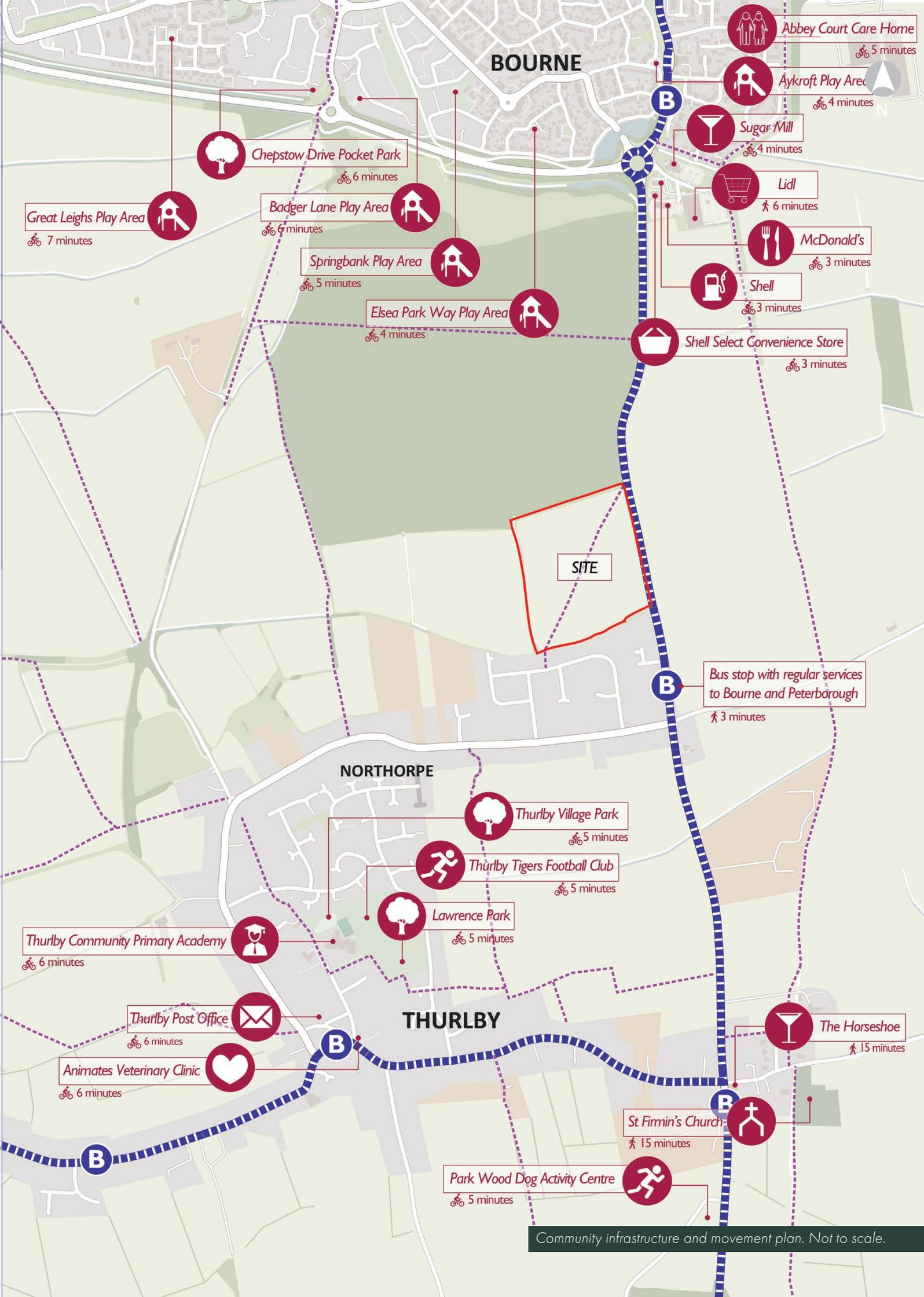
The Site in Context

Land on the west side of Bourne Road is located on the eastern edge of Thurlby, immediately west of the A15/Bourne Road and around 2 miles south of Bourne.

Thurlby lies approximately 9 miles north of Stamford, 17 miles south of Grantham, and 20 miles west of Spalding. The village benefits from strong connections to the wider region via the A15, which links directly to Peterborough in the south and Lincoln in the north.

The site is well related to the existing built-up area of Thurlby and Northorpe, with established residential areas to the west and south. Bourne town centre, offering a wide range of shops, services, schools, and employment opportunities, can be reached within a short cycle or bus ride.

-  Site boundary
-  Care home
-  Playground
-  Public house
-  Supermarket
-  Fast food restaurant
-  Petrol station
-  Convenience store
-  Park
-  Sports ground
-  School
-  Post office
-  Veterinary practice
-  Place of worship
-  Public right of way: footpath
-  Bus route
-  Bus stop



Community infrastructure and movement plan. Not to scale.

A SUSTAINABLE LOCATION

The site is inherently sustainable and aligns with the Town and Country Planning Association's principles for the creation of 20-minute neighbourhoods, as a wide range of existing facilities are already within a short walk, cycle, or bus ride from the site.

Social infrastructure

In the South Kesteven Regulation 18 Draft Local Plan (2021–2041) settlement hierarchy (Policy SP1), Thurlby and Northope is classed as a Larger Village. Larger Villages are described as:

“Settlements which provide a range of local services and facilities and have capacity to accommodate a modest level of development, generally to meet local needs and support the sustainability of the settlement.”

Thurlby and Northope is a well-connected rural settlement with a strong range of local facilities to meet daily needs. Within the village, residents benefit from amenities including:

- **Education:** Thurlby Community Primary School is located within walking distance of the site.
- **Recreation:** Playing fields, a children's playground, and access to nearby public rights of way which offers extended walking and cycling opportunities.
- **Community services:** St Firmin's Church, a village hall, and a convenience store/Post Office.

The nearby market town of Bourne, identified as a Market Town in the South Kesteven settlement hierarchy and located less than two miles to the north, offers an extensive range of shops, supermarkets, restaurants, healthcare services, secondary schools, sports facilities, and employment opportunities.

Connectivity audit: Public transport

The nearest bus stops are located along Bourne Road (A15), a short walk from the site. These stops provide regular services to Bourne, Stamford, Market Deeping, and Peterborough, offering access to a wider range of employment, education, and leisure destinations.

Rail services can be accessed at Peterborough station, approximately 13 miles to the south, providing direct connections to London, Cambridge, and the Midlands.

Connectivity audit: Pedestrian and cycle network

The site benefits from direct and potential future connections to the village's existing footway network along Bourne Road, providing safe pedestrian access to local facilities, including Thurlby Community Primary School, the village hall, and local shops.

A public right of way runs diagonally through the site, linking into the wider network of village footways and paths. This offers excellent opportunities for walking, running, and cycling in both the village and surrounding countryside.

Local roads in Thurlby are generally lightly trafficked, supporting safe cycling conditions within the village.

Connectivity audit: Road network

The site benefits from direct access to the A15, providing a strategic link between Peterborough and Lincoln. This allows convenient travel by car or bus to a range of regional centres, including Stamford, Spalding, Grantham, and the wider A1(M) corridor.

Summary

The facilities and connectivity audit on the previous page demonstrates that Land on the west side of Bourne Road, Thurlby, is a sustainable location for new homes. Residents will be able to meet most daily needs locally, while benefiting from easy access to the services, jobs, and facilities in nearby Bourne and the wider region. The site therefore fully meets the 20-Minute Neighbourhood and Building for a Healthy Life principles, supporting healthy, inclusive, and well-connected communities.



Bourne Town Centre



Bus stop along Bourne Road, Thurlby



Lawrence Park, Thurlby



Thurlby Community Primary Academy

Building for a Healthy Life



Building for a Healthy Life principles advise places should 'offer social, leisure and recreational opportunities a short walk or cycle from their homes' and that developments should 'provide community facilities, such as shops, schools, workplaces, health facilities, co-working spaces, parks, play spaces, cafés and other meeting places that respond to local community needs'.

20-minute neighbourhoods



20-minute neighbourhoods are complete, compact and connected places where people can meet their everyday needs within a short walk, cycle or bus ride. The idea of the 20-minute neighbourhood presents multiple benefits including boosting local economies, improving people's health and wellbeing, increasing social connections in communities and tackling climate change.

THE SITE

The site extends to approximately 7.23 hectares and comprises a single parcel of agricultural land, bounded and framed by mature vegetation in places. The land is generally level, with some localised variation, and contains existing features of ecological and landscape value that can be retained and enhanced as part of the proposed development. A public right of way runs diagonally through the site, linking into the wider network of village footways and paths.

The site is bounded:

- **North** – by Math Wood, designated Ancient Woodland and a Site of Special Scientific Interest (SSSI), which provides a strong ecological and visual boundary.
- **East** – by hedgerow, Bourne Road (A15) and fields in agricultural use beyond.
- **South** – by a drainage ditch and residential development along Woodside Close.
- **West** – by hedgerow, scattered tree planting and fields in agricultural use beyond.

SITE CONSIDERATIONS

Technical assessments have determined that there are relatively few constraints to development.

As is typical for a project of this scale, the site presents various constraints and opportunities that have been carefully considered in the design proposal. The approach aims to address these factors thoughtfully and comprehensively, with the goal of creating a unique and distinctive development for Thurlby.

The plan on the right summarises these findings.

	Site boundary
	Lowest areas of topography
	Existing vegetation
	Water channel
	Flood risk: surface water 1:1000 year event
	Flood zone 2
	Flood zone 3
	Public right of way
	Noise from the A15
	Ancient Woodland
	15m Ancient Woodland buffer zone
	Site of Special Scientific Interest (SSSI)
	Boundary of adjacent properties
	Visually sensitive boundaries
	Long ranging views of the site
	Bus stop
	Existing pedestrian access point



MATH WOOD

ELSEA WOOD

Bourne Road (A15)

PROW Public Footpath: ThuS/20/1

Woodside Close

Cappitt Drive

Elizabeth Way

Elsa Drive

Woodside East

FRAMEWORK MASTERPLAN

The vision for Land on the west side of Bourne Road is to create a sustainable, landscape-led extension to Thurlby that delivers a distinctive new neighbourhood while respecting and enhancing the village's existing character. The proposals respond directly to the principles set out in the Thurlby Neighbourhood Development Plan, which seeks to:

- Deliver high-quality housing that reflects local character and supports a mix of needs (TNPO9, TNP10, TNP11).
- Enhance green infrastructure and biodiversity (TNPO1, TNPO6).
- Maintain the distinct identity of Thurlby and Northorpe by protecting key landscape features and valued views (TNPO1, TNPO2).
- Promote sustainable transport and improved pedestrian and cycle connectivity (TNP18).

Key elements of the masterplan

- **A mix of homes:** Around 117 new dwellings, providing a range of sizes and tenures to meet local needs, including family housing, downsizing options, and affordable homes.
- **Generous green infrastructure:** Approximately 53% of the site is set aside as publicly accessible open space, reflecting TNPO1 and TNPO6 by creating naturalistic parkland, a nature park along the northern boundary, and a community orchard.
- **Biodiversity net gain:** Retention and enhancement of hedgerows and tree planting along site boundaries, with new planting to strengthen ecological connections. Measures include bird and bat boxes, meadow creation, and a wetland habitat in the north-west to support diverse species and manage surface water sustainably.
- **Protection of the ancient woodland:** A 15-metre ecological buffer to Math Wood, meeting Natural England guidance and TNPO1 requirements for safeguarding biodiversity and heritage assets.
- **Integrated movement network:** New and enhanced pedestrian and cycle connections along the western side of Bourne Road, together with an improved surface to the public right of way through the site, in line with TNP18, enabling active travel to village facilities and onward links

to Bourne.

- **Play and recreation:** New parkland, Local Areas for Play (LAPs), and a Locally Equipped Area for Play (LEAP) integrated into green corridors, reflecting TNPO6 by providing accessible recreation for all ages.
- **Sustainable drainage:** A network of SuDS features, including swales and a wetland basin, designed to manage surface water, enhance biodiversity, and form part of the landscape character, in accordance with TNPO6.
- **Character and layout:** A sensitively designed built form that fronts onto public spaces, uses locally appropriate materials, and integrates with the surrounding residential areas, consistent with TNP11 on high-quality, contextually responsive design.

A connected and resilient place

The masterplan provides a framework for a connected, walkable neighbourhood where daily needs can be met locally. It also delivers wider benefits to the community, including new green spaces, improved ecological networks, and safe, attractive links to the existing village and countryside. The approach reflects national guidance on 20-minute neighbourhoods, Building for a Healthy Life, and the aspirations of the Thurlby Neighbourhood Development Plan, supporting the long-term sustainable growth of Thurlby.

Key

- 01 Primary vehicular/cycle/pedestrian access point and crossing point
- 02 Retained pedestrian connection point
- 03 Sustainable Drainage System (SuDS)
- 04 Retained tree planting
- 05 Strategic buffer planting
- 06 Planted green corridor
- 07 Proposed feature trees
- 08 Nature park with meadow and tree planting
- 09 Community orchard
- 10 Recreational footpaths
- 11 Wetland habitat
- 12 Allotments
- ★ Local Area for Play (LAP)
- ★ Locally Equipped Area for Play (LEAP)
- Public right of way alignment/footpath



Create a naturalistic parkland based around nature along the site's northern edge to help mitigate climate change and promote health and wellbeing for all. Meadow planting and species rich grassland create a significant biodiversity net gain.

Bourne Road (A15)



Tree belts at the boundaries are retained within a buffer zone and new bird boxes installed on existing trees to enhance biodiversity



Connect to existing footpaths and promote sustainable modes of transport



Opportunity to explore a footway/shared cycle route within highway land



Creation of a wetland habitat enhances biodiversity and mitigates surface water flooding. It also provides a place for people to enjoy nature, play and relax.

Woodside Close

Woodside East



Potential to explore off-site community benefits



CONCLUSION

This document has demonstrated that Land on the west side of Bourne Road, Thurlby is deliverable, technically unconstrained and a sustainable location for new development.

The Land on the west side of Bourne Road, Thurlby, offers a clear and deliverable opportunity to provide much-needed new housing in a highly sustainable location, in full accordance with the development strategy set out in the South Kesteven Local Plan and the Thurlby Neighbourhood Development Plan.

The proposals respond sensitively to the site's edge-of-village location, respecting the character of Thurlby and Northorpe while delivering tangible benefits for the whole community. The masterplan is landscape-led, protecting and enhancing key views and green infrastructure, safeguarding the setting of Math Wood, and creating a distinctive new neighbourhood that is well connected to existing facilities.

This vision for the site will:

- Deliver around 117 high-quality homes in a range of sizes and tenures to meet local needs, including affordable housing and opportunities for downsizing.
- Provide over half of the site as publicly accessible open space, with new parkland, a community orchard, and enhanced ecological habitats to achieve biodiversity net gain.

- Create safe, attractive pedestrian and cycle connections, linking the new neighbourhood to the village and wider countryside.
- Incorporate sustainable drainage and climate-responsive design to support resilience and long-term environmental quality.

The development will bring economic, social, and environmental benefits, from supporting local services and creating construction-related employment, to delivering new green spaces and active travel links that promote healthy lifestyles.

In doing so, it will embody the core objectives of the Thurlby Neighbourhood Development Plan, contribute positively to the settlement's long-term vitality, and set a high standard for future growth in South Kesteven.

Within this context, we believe Land on the west side of Bourne Road, Thurlby represents a logical and desirable location for growth, and we welcome the opportunity to work positively with the Council and local stakeholders to help bring this site forward.



APPENDIX 3. – ECOLOGY STATEMENT

Our Ref: LH/DH/L173.25

Date: 27 August 2025

Jannika Newlyn

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Dear Jannika,

RE: ECOLOGY STATEMENT TO SUPPORT A REGULATION 18 SUBMISSION FOR LAND OFF BOURNE ROAD, THURLBY

We have undertaken a desk-based study and a review of current and historic aerial photography of the site, including:

- Identifying the proximity to statutory sites designated for nature conservation.
- Assessing current and historical land use.
- Reviewing publicly available ecological datasets and Natural England's standing advice.

The Site lies immediately adjacent to Math & Elsea Wood, a designated Site of Special Scientific Interest and ancient woodland to the north. A Site context plan is provided as Figure 1.

Natural England advises that there needs to be a meaningful buffer between the development and the woodland edge to safeguard root protection areas, hydrology, and ecological connectivity. In addition, lighting, drainage, public access and other indirect impacts need to be carefully designed in order to avoid degradation of woodland quality.

The Concept Masterplan (reference no. 1534 008-2) includes a 'Nature Park' along the northern extent of the Site. This could provide the buffer that Natural England require, thus safeguarding and enhancing the important biodiversity features of the woodland, whilst promoting wellbeing for local residents.

Elsewhere, the Site comprises intensively managed arable land, which is of low ecological value and unlikely to support significant populations of protected or priority species.

The cessation of arable farming also has the potential to reduce adverse effects on the ancient woodland, such as nutrient runoff.

The incorporation of well-designed, functional green infrastructure could be used to mitigate the impact on the woodland by providing alternative amenity space.

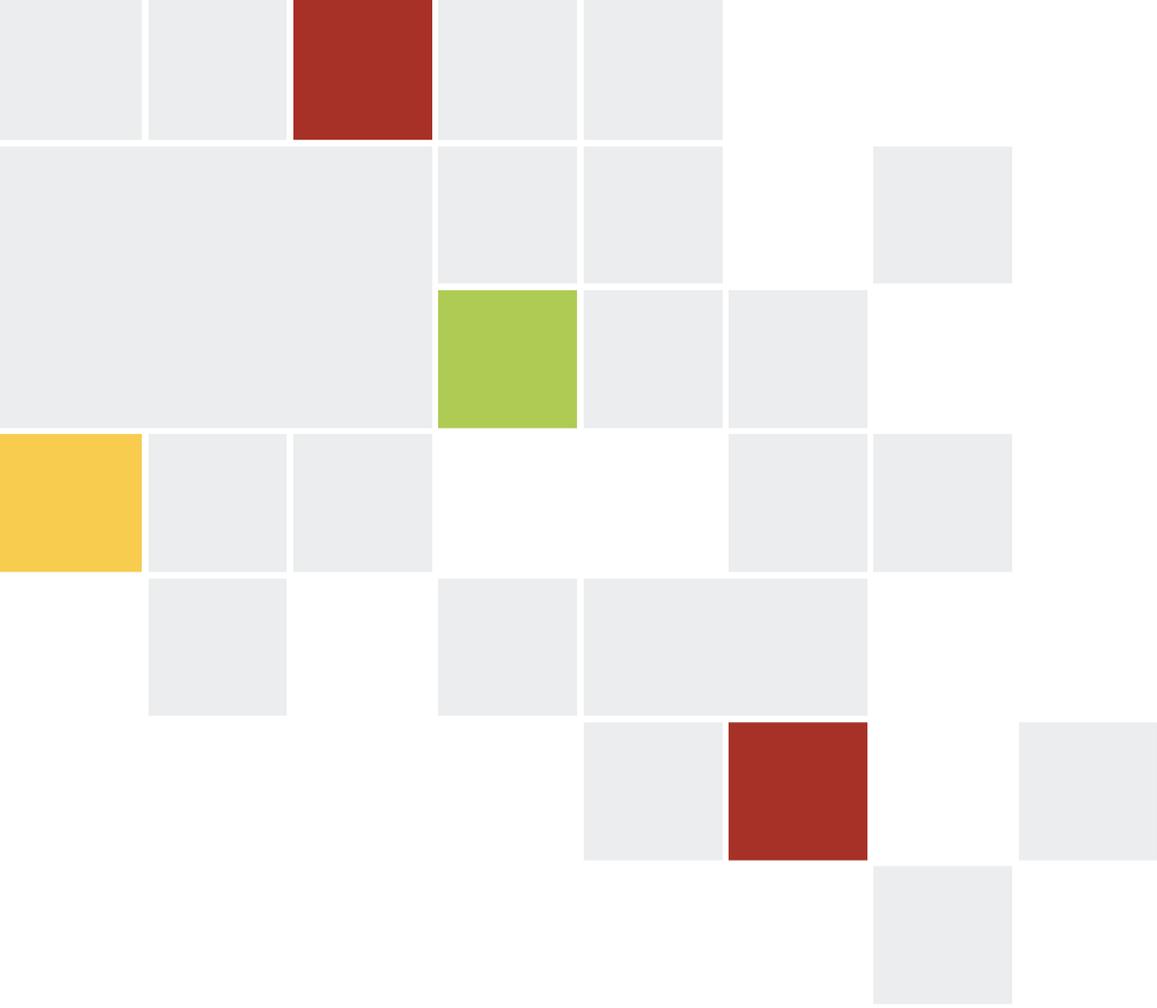
[REDACTED]
[REDACTED] nary:

- The Site lies next to Math and Elsea Wood, which is a SSSI and ancient woodland.
- A buffer will be needed along the northern boundary in line with Natural England guidance.
- The Site is currently intensively farmed, and is likely to be of low ecological value.
- There is scope to meet Biodiversity Net Gain obligations through green and blue infrastructure.
- The change in land use could reduce existing pressures on the woodland like nutrient runoff
- No insurmountable constraints have been identified at this stage and further surveys will be needed to assess any effects and design appropriate mitigation.

Yours sincerely,

[REDACTED]

Luke Hartley, ACIEEM
Senior Ecologist



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