



Claypole Parish Council
Anne Daly - Parish Clerk

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18th August 2025

Dear Ms Brannon

South Kesteven Local Plan Review - Regulation 18 Consultation - Proposed Housing and Mixed-Use Site Allocations

Claypole Parish Council OBJECT to the proposed allocation of Housing Site SKPR-322 Doddington Lane, Claypole

The Parish Council also OBJECT to the Sustainability Appraisal for the Draft Local Plan that has failed to consider all reasonable alternatives and has failed to properly consider the allocation of Housing Site SKPR-322 Doddington Lane, Claypole

Introduction

In response to the 'Part 2' consultation under Regulation 18 on the Draft South Kesteven Local Plan Review, following consideration Claypole Parish Council is submitting a representation to the Local Plan Review and another to the Sustainability Appraisal.

Consultation Period

The choice of South Kesteven District Council to undertake statutory consultation over the main summer school holiday period is considered to be inappropriate. It is common practice that Parish Councils do not meet in August. In practical terms, therefore it has made it difficult for Parish Councils to organise and hold public engagement events on the Local Plan Review in order to help inform their responses.

In our consultation response on the ‘Part 1’ consultation under Regulation 18, the Parish Council made the following specific request:

“Given the fact that the statutory consultation process achieves very limited direct engagement with South Kesteven residents, the Parish Council would request that advance notice of the consultation period should be given to all Parish Councils. This should be sufficient advance notice in order to allow Parish Councils to broaden awareness of the proposals through local newsletters and organise public events or meetings.”

It is extremely disappointing that the District Council has chosen to not respond positively to our suggestion to give Parish Councils advance notice of the consultation; particularly given that this consultation period is over the main summer holiday period.

It is noted that the District Council held four in-person drop-in sessions during the consultation period. Unfortunately, those events were held in Bourne Market; Grantham Market; Stamford Market; and Market Deepings Community Library. Those events were all a considerable distance away from Claypole, the nearest at Grantham was 15km away from the village. Paragraph 16 c) of the NPPF does look for Plans to be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.

Residents of Claypole look to Newark to provide all their higher order services and employment, so Grantham is not a town that residents of Claypole generally access. Given that Claypole is the only settlement proposed to be materially changed in the settlement hierarchy; it is disappointing that the District Council did not hold an engagement event that was more accessible to residents of Claypole.

Claypole Parish Council held a public engagement event on the Local Plan Review on the 13th August 2025. As a consequence of the main summer holiday period many residents have of course been away on holiday. Notwithstanding the impact of holidays some 98 local residents attended the engagement event, this number does not include Parish Councillors who were also in attendance.

The public engagement event raised the following list of questions and issues raised in relation to the proposed housing allocation SKPR-322:

1. Are the criteria used to determine whether a village is considered a small village or a large village clear and appropriate?
2. Will the plan for the proposed allocation ensure that there will be sufficient spaces at the local junior school for students who want them?
3. With the proposed allocation there are likely to be more cars going through the village causing more congestion on Main St. How will this be resolved as part of the SKDC plan?
4. How will the plan for the proposed allocation consider the impact of more traffic through the surrounding roads to Claypole?
5. How does this planned allocation, take into account other developments in the surrounding area. For example, the development of Fernwood and houses adjacent to Shire Lane generating more traffic congestion?
6. How will SKDC ensure that there is adequate drainage capacity not only for the development site, but also for existing roads which are likely to become the recipient of flood water from the proposed allocation site?
7. How will SKDC ensure that there will be appropriate levels of infrastructure to support the development and growth of Claypole Village? (This will link to item 1 above and the criteria for being a larger village).
8. How will SKDC ensure that the mixture of property on an allocated site is appropriate to the local needs of the community, as per the National Planning Policy Framework?

There were a number of other potential concerns raised, but the above summary encapsulates the main areas of concern.

Background

The 'Part 2' consultation under Regulation 18 on the Draft South Kesteven Local Plan Review, follows the 'Part 1' consultation under Regulation 18 in March/April 2024. The Parish Council objected to Policy SP2 - Settlement Hierarchy in that 'Part 1' consultation. The 'Part 2' consultation is based on the incorrect assumptions made in the 'Part 1' consultation that have not been corrected or addressed; as such the 'Part 2' consultation is flawed.

As a reminder our objection to Policy SP2 was:

"The Parish Council considers that Policy SP2 of the Local Plan Review is unsound, and it fails to meet the test of soundness relating to the tests of 'positively prepared', 'justified' and 'effective' as set out in paragraph 35 of the National Planning Policy Framework (NPPF) December 2023.

The Parish Council considers that the proposed amendment to escalate Claypole from a 'small village' to a 'larger village' in the settlement hierarchy is not based on cogent or substantive evidence.

In support of its position the Parish Council has had regard to the following matters:

- *Findings of the Inspector on the current Local Plan settlement hierarchy and the original methodology*
- *Lack of any evidence base changes*
- *Community engagement and relationship to the Neighbourhood Plan*
- *The relevance of the cross-boundary relationship to Newark*
- *Incorrect scoring for Claypole*
- *The methodology for determining the settlement hierarchy is fundamentally flawed and incomplete*
- *The geographic isolation of Claypole from the remainder of South Kesteven and the role and function of Claypole as a settlement"*

Our full rationale underpinning our position on Policy SP2 was set out in the technical paper produced by the planning consultant who has supported the Parish Council on the Neighbourhood Plan and other planning matters over many years.

Also, in the 'Part 1' consultation the Parish Council supported Policy H1 - Housing Allocations as it was set out at that time.

As a reminder our supporting representation on Policy H1 - Housing Allocations was:

"Claypole Parish Council supports Policy H1 in so far as Claypole is concerned, because it does not propose to allocate any sites for housing in Claypole. The Claypole Neighbourhood Plan already includes two housing allocations."

As we explained in the technical paper that accompanied our representation on the 'Part 1' consultation the Parish Council would resist any proposals to allocate land for additional housing in Claypole in the Local Plan if promoted by other parties or suggested by South Kesteven.

Proposed Allocation - Housing Site SKPR-322 Doddington Lane, Claypole (OBJECT)

The Parish Council considers that the proposed allocation of Housing Site SKPR-322 Doddington Lane, Claypole in the Local Plan Review is unsound, and it fails to meet the test of soundness

relating to the tests of ‘positively prepared’, ‘justified’ and ‘effective’ as set out in paragraph 36 of the National Planning Policy Framework (NPPF) December 2024.

The Parish Council considers that the proposed allocation is unacceptable for the following reasons:

- The evidence base underpinning the Local Plan Review is incomplete and fundamental evidence that is relevant to the choice of allocations, including the Strategic Flood Risk Assessment has not been undertaken
- Inconsistency of strategic policies, most importantly the inconsistent approach to housing distribution and employment land
- The site assessment process is flawed and inconsistent
- The allocation fails to be supported by the site assessment process
- Lack of any evidence base changes to support the amendment to the settlement hierarchy and the methodology for determining the settlement hierarchy is fundamentally flawed and incomplete
- Community engagement and relationship to the Neighbourhood Plan
- The relevance of the cross-boundary relationship to Newark
- The geographic isolation of Claypole from the remainder of South Kesteven and the role and function of Claypole as a settlement

Our full rationale underpinning our position is set out in the technical paper produced by the planning consultant who has supported the Parish Council on the Neighbourhood Plan and other planning matters over many years. Our position in terms of the allocation is indivisible from our contention that the settlement hierarchy remains flawed and Claypole has been incorrectly assessed.

Change Requested - The proposed housing site allocation SKPR-322 should be dropped and not be taken forward in the Publication Draft of the South Kesteven Local Plan. In addition, the Settlement Hierarchy be reworked and for Claypole to remain classified as a ‘small village’.

Sustainability Appraisal Addendum (OBJECT)

The Sustainability Appraisal Addendum for the Draft Local Plan is considered to be fundamentally flawed as it has failed to consider the reasonable alternatives for meeting the housing supply; namely it has failed to consider the alternative of delivering housing through a new settlement.

It is noted that site SKPR-278 (GR3-H1): Spitalgate Heath - Garden Village (Mixed Use Allocation) has indicative unit numbers of 3,700 houses (1,512 anticipated to be constructed by 2043). There has been no consideration however as to whether the proposed new allocations for the Larger Villages which totals 2,421 dwellings could more appropriately be provided in a new settlement, with newly planned infrastructure.

The optimum size for a garden village, according to the UK government, is generally between 1,500 and 10,000 homes. This size range allows for a balance between creating a distinct, self-contained community with its own facilities and infrastructure, while also being smaller than a new garden town which typically has over 10,000 homes. The level of growth for South Kesteven is of a level where a reasonable alternative that needs to be considered is a new settlement.

The SA Addendum in paragraph 5.28 states:

“It is recognised that the sites may also contain non-designated heritage assets and features which could also be impacted by development. In this respect, the Historic Environment Record (HER) will be reviewed within the SA Report accompanying the Regulation 19 version of the Local Plan to determine the potential impacts to non-designated heritage assets and features.”

The SA undertaken is therefore incomplete as the SA addendum acknowledges. It is inappropriate to make decisions on site selection in the absence of properly assessing all factors through a robust Sustainability Appraisal.

The SA Addendum in the Climate Change section is completely silent on the consideration of flood risk from all sources, including surface water flood risk. In this respect the SA Addendum is fundamentally flawed.

Change Requested - The Sustainability Appraisal should reconsider all reasonable alternatives to meet housing supply, including a new settlement instead of distribution across existing settlements. The SA process for proposed sites should be carried out properly assessing factors including the full range of heritage assets and flood risk from all sources. In addition, the Parish Council still considers that the Settlement Hierarchy amendments need to be assessed in the SA and be reworked to take full account of the SA Objectives resulting in Claypole remaining classified as a 'small village'.

Conclusion

The above is the formal response from Claypole Parish Council. It is noted that the timetable for the Local Plan Review indicates that consultation on the next stage of the Local Plan Review, the Regulation 19 Pre-Submission version is scheduled for January - February 2026.

**Anne Daly
Clerk to Claypole Parish Council**

Enclosure

Technical Paper for Claypole Parish Council Representations



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South Kesteven Local Plan Review Regulation 18 Consultation - Proposed Housing and Mixed-Use Site Allocations

Technical Paper for Claypole Parish Council Representations



South Kesteven Local Plan Review - Regulation 18 Consultation- Proposed Housing and Mixed-Use Site Allocations

Technical Paper for Claypole Parish Council Representations

In response to the 'Part 2' Regulation 18 consultation on the Proposed Housing and Mixed-Use Site Allocations for the Draft South Kesteven Local Plan Review; following consideration it is my advice that Claypole Parish Council submit a representation to the Local Plan Review as set out below. Together with another representation on the Sustainability Appraisal for the Local Plan Review.

Proposed Allocation - Housing Site SKPR-322 Doddington Lane, Claypole

The Parish Council is advised to object to the proposed allocation of Housing Site SKPR-322 Doddington Lane, Claypole in the Local Plan Review is unsound, and it fails to meet the test of soundness relating to the tests of 'positively prepared', 'justified' and 'effective' as set out in paragraph 36 of the National Planning Policy Framework ([NPPF](#)¹) December 2024.

In support of its position our advice considers, and the Parish Council has had regard to the following matters:

- The evidence base underpinning the Local Plan Review is incomplete and fundamental evidence that is relevant to the choice of allocations, including the Strategic Flood Risk Assessment has not been undertaken
- Inconsistency of strategic policies, most importantly the inconsistent approach to housing distribution and employment land
- The site assessment process is flawed and inconsistent
- The allocation fails to be supported by the site assessment process
- Lack of any evidence base changes to support the amendment to the settlement hierarchy and the methodology for determining the settlement hierarchy is fundamentally flawed and incomplete
- Community engagement and relationship to the Neighbourhood Plan
- The relevance of the cross-boundary relationship to Newark
- The geographic isolation of Claypole from the remainder of South Kesteven and the role and function of Claypole as a settlement

These matters are explained in more detail in the following sections.

Evidence Base

The evidence base underpinning the Local Plan Review is incomplete and as the Local Plan [website](#)² explains:

“Documents which form the evidence base for the preparation of the Local Plan Review.

The Council has been progressing its evidence bases to support and inform the Local Plan Review. This page contains the Council's most up-to-date reports, studies, and assessments which have helped shape the policies in the Draft Local Plan.

Other evidence being produced to inform the emerging Local Plan which will be published as it becomes available is:

¹ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

² <https://www.southkesteven.gov.uk/local-plan-review-evidence-base>

- *Strategic Flood Risk Assessment*
- *Water Cycle Study*
- *Infrastructure Delivery Plan*
- *Gypsy, Traveller and Travelling Showpeople: Meeting the identified accommodation need*
- *Employment Land Study Update*
- *Local Housing Needs Assessment Update*
- *Climate Change Update”*

Fundamental evidence that is relevant to the choice of allocations, including the Strategic Flood Risk Assessment (SFRA) has not been undertaken.

Paragraph 171 of the NPPF is explicit that: *“Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.”*

Making provision for housing, through allocations is a matter identified within the scope of ‘strategic policies’ as defined in paragraph 20 of the NPPF. Consequently, the strategic flood risk assessment should have been undertaken to inform the choice of housing allocations and the sustainability appraisal process.

Planning Practice Guidance (Reference ID: 7-009-20220825) advises:

“A Strategic Flood Risk Assessment is a study carried out by one or more local authorities or other strategic policy-making authorities to assess the risk to an area from flooding from all sources, now and in the future, taking account of the impacts of climate change, and to assess the cumulative impact that land use changes and development in the area will have on flood risk. It identifies opportunities to reduce the causes and impacts of flooding and gathers information on the land that is likely to be needed for flood risk management infrastructure. A Strategic Flood Risk Assessment should be used to:

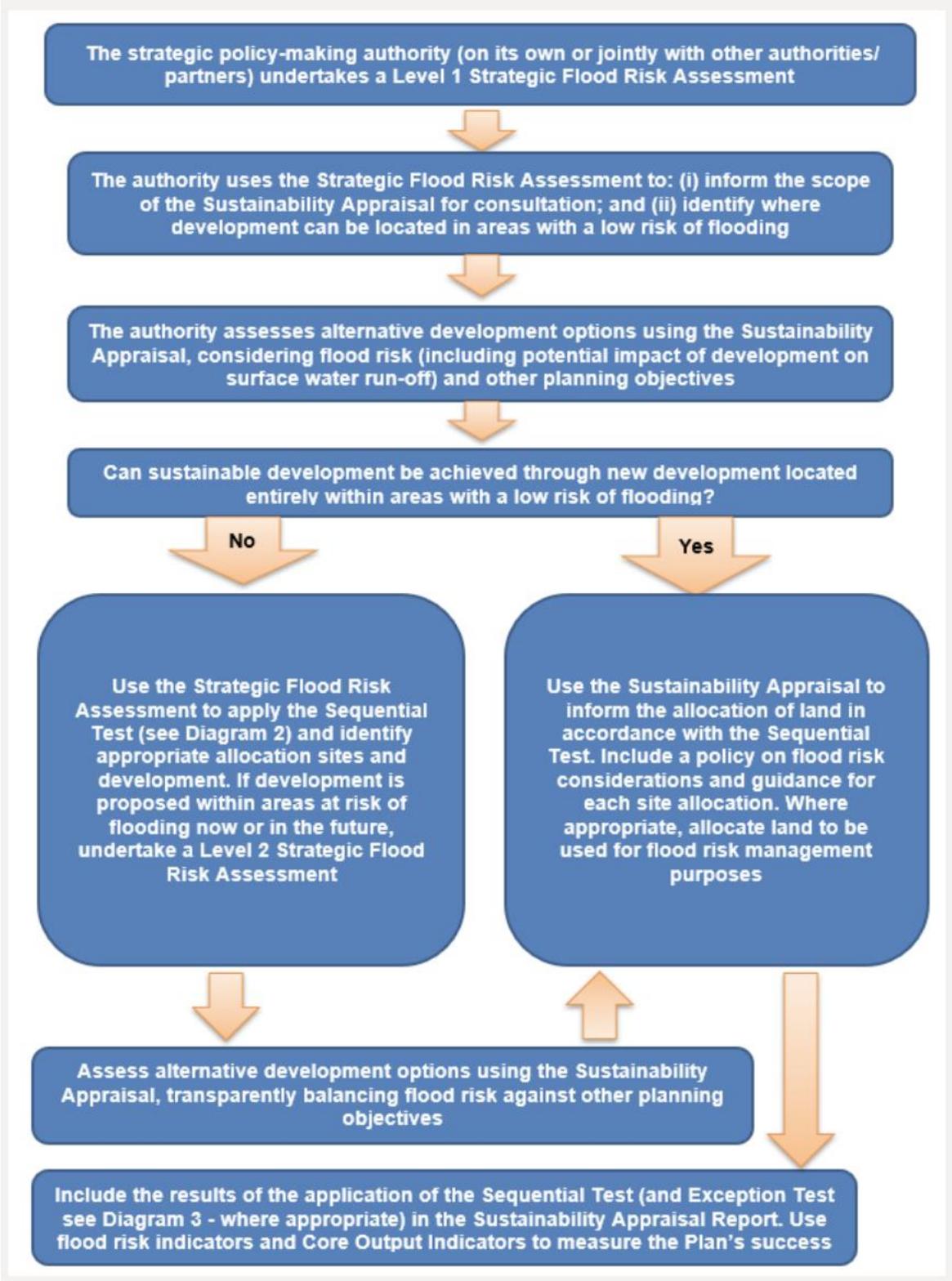
- *inform the sustainability appraisal of the Local Plan, so that flood risk is fully taken into account when considering allocation options and in the preparation of plan policies;*
- *apply the Sequential Test and, where necessary, the Exception Test when determining land use allocations;*
- *inform the allocation of land to safeguard it for flood risk management infrastructure;*
- *inform policies for change of use and reducing the causes and impacts of flooding;*
- *identify the requirements for site-specific flood risk assessments in particular locations, including those at risk from sources other than river and sea flooding;*
- *determine the acceptability of flood risk in relation to emergency planning capability;*
- *help demonstrate how the adaptation to climate change has been met.*

Local Planning Authorities should take an integrated approach to flood risk management when preparing plans, as per National Planning Policy Framework paragraph 161(c). This is a collaborative, catchment-based approach delivering coordinated management of water storage, supply, demand, wastewater, flood risk, quality of water and the wider environment. It can help to identify the most effective and efficient approaches to addressing too much or too little water, enabling sustainable and climate resilient development in a way which reduces flood risk whilst delivering multiple wider benefits.”

Planning Practice Guidance is clear that an SFRA should be used to inform the site allocation process and the sustainability appraisal process. As the SFRA has not been produced yet, then the entire evidence base underpinning the site allocation process at this consultation stage is unsound because it is not based on cogent and substantive evidence.

Planning Practice Guidance shows in diagrammatic form how flood risk should be taken into account in plan-making as follows:

Diagram 1: Taking flood risk into account in the preparation of strategic policies



Extract from Planning Practice Guidance (Reference ID: 7-007-20220825)

Given that flood risk changed substantially in the first quarter of 2025 through the production of the National Flood Risk Assessment by the Environment Agency; which led to the launch of updated data in the Flood Map for Planning in April 2025. Then not to have undertaken the necessary SFRA is even more important.

Inconsistency of Strategic Policies

Paragraph 20 of the NPPF states:

“Strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision¹² for:

- a) homes (including affordable housing), employment, retail, leisure and other commercial development;*
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
- c) community facilities (such as health, education and cultural infrastructure); and*
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”*

There is a need most importantly to ensure that the spatial strategy balances homes and employment through a consistent approach to housing distribution and employment land. An update to the Employment Land Study is one of the evidence base documents that has not yet been undertaken.

The ‘Part 1’ Regulation 18 consultation proposed an employment allocation spatial strategy based on a strategic employment site at Grantham Southern Gateway; together with other allocations at Grantham Gonerby Moor; Stamford; Bourne; The Deepings; and Long Bennington. Although the main employment site listed under Long Bennington is actually at Roseland Business Park which is actually in the open countryside on the Leicestershire border some 3km south of Long Bennington.

The Local Plan Review indicates that the Council proposes not to take forward three significant site allocations in Grantham and The Deepings as follows:

- SKPR-268 - Grantham, Station Approach (mixed-use) for 268 houses due to concerns regarding site deliverability
- SKPR-57 - Grantham, Belton Lane for 628 houses due to significant impact on highways
- SKPR-144 - The Deepings, Millfield Road, Market Deeping for 200 houses due to proposed land allocations to be focused to the east of The Deepings

This has the potential to exacerbate the imbalance between the housing and employment spatial strategies, particularly at Grantham as the principal settlement. In addition, site SKPR-65 - Grantham, Prince William of Gloucester Barracks (mixed-use) proposes to decrease the housing element from 4,000 to 3,000 dwellings.

Although it is noted that new sites SKPR-323 - Grantham, Land north of Gorse Lane for 874 houses and SKPR-334 (SKPR-189, SKPR-263, SKPR 310, SKPR 313) - Grantham, Land south of Gorse Lane (mixed-use) for 530 dwellings are proposed. Albeit this still results in a net reduction in 468 dwellings at Grantham, after minor increases in site capacities on two sites in Grantham are taken into account; which is inconsistent with the Strategy Employment Opportunity being at Grantham.

Claypole has no local employment site and due to its proximity to the Newark Urban Area is the employment centre where the majority of residents in Claypole would be expected to work.

Residents of Claypole do not have effective accessibility via sustainable travel modes to any of the sites allocated for employment in the Local Plan Review.

The Local Plan Review proposes the following distribution strategy for housing:

Table 6: Existing and proposed housing supply

Location	Completions (2023/24)	Existing Supply as at 31 April 2024*	Adopted Local Plan housing land allocations	Proposed Local Plan housing land allocations	Total supply (based on delivery up to 2043)
Grantham	93	2,402	4,956	1,576	9,027
Stamford	56	329	1,610	105	2,100
Bourne	236	732	0	1,037	2,005
The Deepings	24	173	753	1,137	2,087
Larger Villages	137	670	461	2,421	3,689
Other Settlements	29	735	0	0	764
Total	575	5,041	7,780	6,276	19,672

*existing supply includes commitments, consents, council capital programmes, windfall allowance based on 30 dwellings per annum, (not including small site lapse rate).

Table 7: Housing distribution

Current percentage distribution of development	
Grantham	46%
Stamford	11%
Bourne	9%
The Deepings	11%
Larger Villages	19%
Other Settlements	4%

The employment land spatial strategy is based on proposed new allocations as follows:

Grantham	290.89 hectares	(85.7%)
Stamford	3.90 hectares	(1.1%)
Bourne	11.00 hectares	(3.2%)
The Deepings	18.20 hectares	(5.4%)
Long Bennington	15.29 hectares	(4.5%)

Whilst it is accepted that the Local Plan Review proposes to safeguard existing employment sites, they are providing existing employment and are not new sites designed to provide additional employment growth to balance the proposed housing growth. The Local Plan Review does not set out a spatial strategy which is based on achieving a sufficient balance between housing and employment growth.

For example, Long Bennington is the only Larger village to have employment land allocations proposed. Although, in terms of housing allocations at 50 dwellings, Long Bennington has the second lowest amount of additional housing proposed.

Neither is there any explanation as to why the Larger Villages collectively are intended to accommodate some 19% of housing, which is twice as much as the individual market towns of Stamford, Bourne and The Deepings.

Notwithstanding the fact that the definition of Claypole as a ‘larger village’ is disputed; it is noted that not all larger villages have allocations proposed anyway. Caythorpe & Frieston has no allocation proposed. The Local Plan doesn’t explain why Caythorpe & Frieston has no housing allocation proposed; neither does it explain the rationale for the housing allocations proposed in the larger villages.

The following housing allocations are proposed in the proposed larger villages:

Ancaster	181 Dwellings
Barkston	54 Dwellings
Barrowby	725 Dwellings
Baston	283 Dwellings
Billingborough	130 Dwellings
Caythorpe & Frieston	Nil
Claypole	86 Dwellings
Colsterworth	310 Dwellings
Corby Glen	437 Dwellings
Great Gonerby	86 Dwellings
Harlaxton	112 Dwellings
Langtoft	55 Dwellings
Long Bennington	50 Dwellings
Morton	119 Dwellings
South Witham	172 Dwellings
Thurlby & Northorpe	136 Dwellings

This is a total of 2,936 dwellings, this seems to differ by some 54 dwellings from the figure in Table 6 which totals 2,882 dwellings (461 houses in adopted local plan allocations + 2,421 houses in proposed local plan allocations). Such inconsistencies undermine the robustness of the approach taken in the local plan.

It is also unclear where the figures count allocations contained in made Neighbourhood Plans. The Claypole Neighbourhood Plan contains two housing allocations, namely:

- Site Ho/Cla/1 - Main Street - 7 dwellings
- Site Ho/Cla/2 - Barnby Lane - 3 dwellings

It is accepted that Site Ho/Cla/2 now has planning consent under S25/0492 (Reserved Matters), following S24/1682 (Outline) and S23/2126 (Outline). However, even the first of these outline consents (S23/2126) which was approved on the 24th May 2024 was granted post the base date for the existing supply commitments. As such this site is not counted anywhere in the above figures.

Claypole therefore has an additional 10 dwellings in allocations in a made Neighbourhood Plan which do not appear to be taken into account in the distribution strategy for housing.

There are 15 other made Neighbourhood Plans in South Kesteven in addition to Claypole; the full list is as follows:

Carlby
Caythorpe And Frieston

Claypole
 Colsterworth
 Corby Glen
 Foston
 Hough on the Hill
 Long Bennington
 Old Somerby
 Rippingale
 Ropsley and District
 Skillington
 Stamford
 Stubton
 Thurlby
 The Deepings

It is not known whether any of these other made Neighbourhood Plans contain housing allocations or not. If they do then any housing allocations would need to be counted in the figures.

The figures in Table 7 whilst being factually correct do not explain the impact of the proposed new local plan housing allocations which are unduly focussed on the larger villages as follows:

Distribution of proposed local plan housing allocations

Grantham	1,576	(25%)
Stamford	105	(1%)
Bourne	1,037	(17%)
The Deepings	1,137	(18%)
Larger Villages	2,421	(39%)
Other Settlements	0	(0%)

Site Assessment Methodology

It is noted that each developed ‘assessment criterion’ has been grouped into two categories. ‘Major Criteria’ or ‘Other Criteria’ defined as:

- *“Major criteria: These criteria relate to matters of critical importance. For example, this includes flood risk, highway safety and impacts on designated ecological sites. Conflict with one or more major criterion, means the proposed site could have an impact on human health, the environment, or cause conflict with national planning policy and legislation.*
- *Other criteria: These criteria relate to a wide range of locally important issues. For example, this includes, impacts on the historical environment, land contamination and distance from facilities and services. Conflict with one or more other criterion will generally not lead to the same implications as the identified major criterion and usually have the potential to be overcome, managed, or mitigated.”*

The assessment criteria have a Red / Amber / Green (RAG) system, which is accepted to be a straightforward method of assessment.

Major Assessment Criteria 1 - Settlement Type. This doesn’t correctly apply the RAG system. The site assessment process looks to include in the green criteria any site located within a Sub Regional Centre a Market Town or a Larger Village. This is a significant over-simplification of the settlement hierarchy; none of the larger villages provide anything like the same range of services and facilities as found in the Sub Regional Centre and Market Towns. As such Larger Villages should be included within a new Amber category.

Major Assessment Criteria 4 - Surface Water Flood Risk (Pluvial). This criteria doesn't refer to taking into account the correct evidence base, namely the surface water flood data contained within the Flood Map for Planning produced by the Environment Agency. It is noted that reference is made to information surrounding surface water flood risk having been sourced from external consultation with Lincolnshire County Council as the lead flood authority. However, that provides no clarity that the correct surface water flood map layers in the Flood Map for Planning have been used.

This assessment criteria also makes no mention of the sequential approach that needs to be undertaken, having regard to flooding risk from all sources.

Other Assessment Criteria 2 - Distance to services and facilities. In this criteria the Council uses different distances for the thresholds between categories for different services and facilities. There is no explanation as to why the distances chosen have been selected. Active Travel England advice suggests that there should be a mix of local amenities located within an 800m walking and wheeling distance; and that most buildings within the site should be within 400m of a high-frequency bus stop or 800m of a rail/light station or tram stop, with appropriate facilities. Some of the distances used are far in excess of these suggested criteria.

The criteria for access to employment, does not factor in accessibility by sustainable transport means. As it is currently written it appears to promote the use of short journeys by private car which is at direct odds to the principles of sustainable development.

In addition, the broad accessibility of a site is an issue which should probably be a Major Assessment Criteria.

Other Assessment Criteria 3 - The Historic Environment. This criteria fails to adhere to the NPPF in that consideration must be made to the overall historic environment which includes designated and non-designated heritage assets. The criteria make no reference to non-designated heritage assets; the Claypole Neighbourhood Plan identifies non-designated heritage assets which need to be considered. In addition, the Lincolnshire Historic Environment Record contains important information on heritage assets including archaeology and aspects such as ridge and furrow that do not appear to have been considered at all.

Other Assessment Criteria 4 - Agricultural Land. This criteria is applied inconsistently with national policy in the NPPF which seeks to ensure that the Best and Most Versatile Agricultural Land is protected. That includes Grades 1, 2 and 3a land.

Other Assessment Criteria - Additional Considerations. There is no consideration of aspects contained in made Neighbourhood Plans where conflict could arise. For example, important local views/vistas; protected settlement breaks; local green spaces; sport/recreation grounds and potentially other factors that may be in any of the 16 made Neighbourhood Plans across South Kesteven.

Site Assessment Scoring - Claypole Generally

It is noted that some 11 sites have been assessed in Claypole, although 4 of these sites are the proposed allocation which has been assessed collectively and in three separate parts.

Many of these sites were considered for allocation through the Claypole Neighbourhood Plan which used a robust site assessment methodology; and were considered unsuitable for various reasons.

It should be noted that Site SKPR-188 - Land off Main Street, Claypole is actually part of the Neighbourhood Plan Housing Allocation - Site Ho/Cla/1 - Main Street - 7 dwellings.

In terms of consistency with the Claypole Neighbourhood Plan the following comments are relevant:

Policy 5 - Design of New Development/Local Distinctiveness (Character Appraisal)

- Sites SKPR-51/SKPR-54/SKPR-249/SKPR-322 - Doddington Lane would all result in the informal lane character of Doddington Lane identified as being important to the character of the village being lost
- Site SKPR-197 Gordon House Farm could impact on the important village gateway identified on Doddington Lane and would result in the informal lane character of Doddington Lane identified as being important to the character of the village being lost
- Site SKPR-191 - Land at Oster Fen Lane would result in the informal lane character of Oster Fen Lane identified as being important to the character of the village being lost

Policy 6 - Local Views & Vistas

- Site SKPR-5 - Barnby Lane, Claypole would need to retain the important view and vista (No.3 School Lane/Brunts Farm Close - Looking North) along its eastern side
- Site SKPR-197 - Gordon House Farm, Claypole would conflict with the important view and vista (No.5 Doddington Lane - Looking South)

Policy 8 - Local Green Space

- Site SKPR-172 - The Grove Farm, Claypole would need to incorporate the designated Local Green Space along Hough Lane along its southern edge. However, redevelopment here would offer the potential to enhance the setting of the Local Green Space

Policy 9 - Opportunities for Enhancement

- Site SKPR-172 - The Grove Farm, Claypole would provide a positive method of delivering the opportunity for enhancement identified for the Northern end of Hough Lane

Policy 15 - Community Facilities

- Site SKPR-125 - Land to the east of Rectory Lane, Claypole would conflict with Policy 15 of the Neighbourhood Plan which allocates this site for community use and protects it from being used for alternative use

Policy 16 - Setting of Claypole Village

- This policy looks to protect the historical ridge and furrow landscape around the village identified on the Lincolnshire Historic Environment Record, the following sites would conflict with this policy: SKPR-5 - Barnby Lane; SKPR-51/SKPR-54/SKPR-249/SKPR-322 - Doddington Lane; SKPR-196 - Main Street; and SKPR-197 - Gordon House Farm

The Neighbourhood Plan Site Assessment Methodology made a specific conclusion on Site SKPR-172 - The Grove Farm (which in the Neighbourhood Plan was assessed as site N Grove Farm, Hough Lane). That conclusion was:

“Overall, the site is considered to be suitable for potential development; although the lack of it being put forward for development through any mechanism means that the site cannot be considered achievable or deliverable. Consequently, it is not appropriate to be allocated for housing in the Neighbourhood Plan.

However, it lies within the settlement boundary identified in the Neighbourhood Plan and Policy 13 can set out a positive policy framework that would support redevelopment and the site coming forward as a ‘windfall’ site if the position regarding achievability and deliverability changes during the plan period.”

As such at that time it hadn't been put forward as part of any call-for-sites exercise; that was a primary reason for it not being allocated. The settlement boundary was however specifically designed to include that site

The reasoning and rationale for selecting some sites over others is not properly explained. As such it is difficult for those commenting on the Local Plan to understand why some sites have been selected ahead of other sites.

There is also inconsistency in the scoring mechanism used, for example Site SKPR-5 on Barnby Lane is cited as having a 'moderate' impact on the local highway network and local road network. This seems to be because road widening is required as well as a 30mph speed limit extension and connecting footways. However, sites SKPR-51/SKPR-54/SKPR-249/SKPR-322 - Doddington Lane which would similarly require road widening as well as a 30mph speed limit extension and connecting footways is listed as having a 'minor' impact on the local highway network and local road network.

A further inconsistency is SKPR-197 at Gordon House Farm to the south of Doddington Lane is recorded as having a 'moderate' impact on the local highway network and local road network. Whereas sites SKPR-51/SKPR-54/SKPR-249/SKPR-322 also on Doddington Lane are listed as having a 'minor' impact on the local highway network and local road network.

Site SKPR-172 at Grove Farm is put down as having a 'moderate' impact on the local road network because the carriageway needs formalising with kerbing/drainage as well as footway widening. Such works would be very modest compared with the works necessary on Doddington Lane for SKPR-51/SKPR-54/SKPR-249/SKPR-322.

Site Assessment Scoring - Proposed Allocation Housing Site SKPR-322 Doddington Lane, Claypole

The allocation of this site has been suggested before and at Parish Council meetings there have been numerous concerns regarding the proposed development being expressed by local residents in the public participation period. Regarding this site local residents have organised a petition in objection to the planning application made, which we understand was sent to South Kesteven District Council.

This petition had a total of 483 signatures. The 2020 ONS population estimate for Claypole is 1,354, of which 1,095 are adults. Therefore some 44% of the adult population appear to have signed the petition. This demonstrates an overwhelming lack of public support for developing this site.

Relationship to the Claypole Neighbourhood Plan

The Claypole Neighbourhood Plan was passed at Referendum on the 5th October 2023 at which point it became part of the development plan, it was subsequently 'made' (which is now purely an administrative act) by SKDC on the 23rd November 2023.

There has been a clear view amongst residents that they were fearful of losing their 'village' identity. In terms of housing development, they were strongly opposed to large scale development; with a strong preference for a small level of future housing development to maintain Claypole as a sustainable small village and to meet local community needs. In terms of the number of houses those responding to the Neighbourhood Plan consultation considered would be appropriate for Claypole over the plan period; the median figure was 11-15 dwellings.

The Neighbourhood Plan allocates two housing allocations and sets out a strategy to plan for growth of 7.5% over the period from 2021 to 2036. That represents growth of some 43 additional dwellings through commitments, allocations and a small windfall allowance. Going from a 2021 baseline of 570 dwellings to some projected 613 dwellings in 2036.

The proposed local plan site allocation for 86 dwellings increases that projected baseline by 2043 to 699 dwellings, even if no further windfall is accounted for the period between 2036 and 2043. The proposed allocation would individually represent growth of 15.1% on the 2021 baseline and

cumulatively with the Neighbourhood Plan proposals would represent growth of 22.6%, from the 2021 baseline to the 2043 projection.

In recent decades the village has more than doubled in size from around 250 dwellings in the early 1980s to around 570 dwellings at the present time. Growing by a further quarter up to 2043 would significantly impact on the character of the village.

The Neighbourhood Plan Site Selection Methodology³ assessed thirteen potential housing sites against twenty-one criteria. The proposed allocation site (known as site P in the methodology) was one of the thirteen sites assessed; it scored joint worst of all the thirteen sites assessed.

Is the Site an Appropriate Location for Development?

As already identified in recent decades the village has more than doubled in size; this is an important context against which to consider further growth. In addition, the inter-relationship to the defined Newark Urban Area and the impact on the balanced approach recently adopted in the Newark & Sherwood Core Strategy needs to be considered.

The South Kesteven Local Plan identifies a settlement hierarchy under Policy SP2. Grantham continues to be defined as a Sub-regional centre; the second level in the settlement hierarchy is then the three towns of Stamford, Bourne and The Deepings. The third category of settlement hierarchy is then 15 defined 'Larger villages'; which actually involves 17 settlements as two of the 'larger villages' actually involve multiple settlements.

Claypole lies approximately 8.5 miles from Grantham; 28 miles from Stamford; 23.4 miles from Bourne; and 28.5 miles from The Deepings. As a village it is poorly related to these towns in direct comparison to the approximate 0.6 miles from the edge of the defined Newark Urban Area.

The proposed allocation represents a 'bolt-on' to the existing settlement; it does not integrate well into the existing built form of Claypole but is instead an insular development that lacks connectivity. It lacks any existing physical connectivity into the existing built form and road or footpath network; the 1.6m wide footway link along the northern side of Doddington Lane has resulted in the harmful urbanisation of Doddington Lane which has an informal rural lane character along the southern side of the village. Also, it can be seen on the ground that the verge on this corner already experiences vehicles overrunning the verge due to the alignment of the bend and the narrowness of the carriageway.

Doddington Lane transitions from a village road to becomes a rural lane just south of Peacock Launde. The change in character here is stark arising from the open vista to the south; the lack of footways; and the narrowing of the carriageway. As the road bends eastwards, the lane has a verdant appearance with a strong open and undeveloped character. It is physically and visually obvious that the village has ended and the countryside has begun. The proposed site is therefore functionally, physically and visually part of the countryside south of the village. Therefore, the site does not reflect the layout and character of the surrounding area.

The road access off Doddington Lane which is over 300m away from the existing edge of the village at Peacocks Launde. This distance and the unlit nature of this lane will be a barrier to successful integration as future occupiers will not be encouraged to use this route. The site does have a potential foot link via the single narrow footpath alongside Coulby Close; this is poorly located in the corner of Coulby Close and has the appearance of a path to the bungalow rather than a footway link to land to the south. The distance to the site access from the nearest other built parts of Claypole makes it look like a site that is physically and visually separated from the host community of Claypole. This will reinforce its character and appearance as an isolated and insular development.

³ <https://claypole.parish.lincolnshire.gov.uk/downloads/file/127/claypole-ndp-site-selection-may-2022>

The NPPF in paragraph 96 a) seeks to: *“promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other - for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages.”* The proposal conflicts with this advice in that it has been designed as an insular site which lacks integration into the host community.

The site only adjoins the existing built form of Claypole on one side to the north; it is separated by a field from the existing built form to the west. The south and eastern sides abut open countryside. Spatially and visually the site is currently part of the open countryside in character and appearance, it has no functional or physical relationship to the existing village.

This physical and visual separation emphasises how the development fails to reflect the form, structure, character and appearance of the village.

Claypole has a limited range of local services and facilities, these do not cater for day-to-day needs. The village has poor accessibility to higher order services and facilities, there are no footways or cycleways to Fernwood and Newark or to Long Bennington or Caythorpe. The rural and relatively narrow nature of the local road network is not conducive to undertaking journeys on foot or cycle thereby meaning that residents are likely to be unduly reliant upon use of the private car. Due to the close juxtaposition with Newark, Claypole has limited employment opportunities; there are no business units or similar that provide employment opportunities.

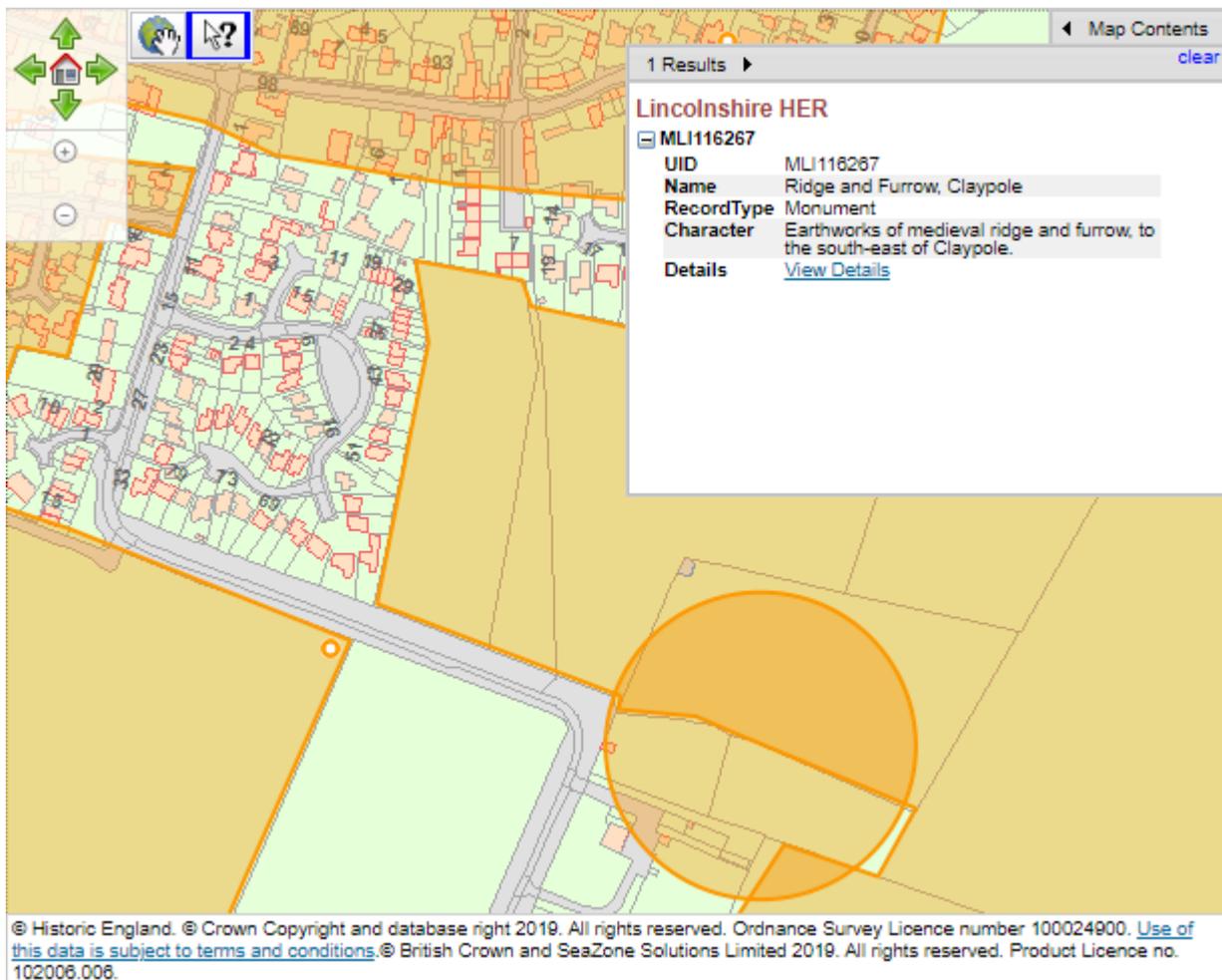
Claypole has very poor public transport with only limited bus services. The centre of the proposed site is some 400m from the closest bus stop.

There is no General Practitioner surgery in the village, the nearest being Long Bennington and Balderton which is part of the Newark Urban Area; with the nearest pharmacy being in Balderton. The very limited bus services do not provide suitable levels of accessibility to these health facilities, the Balderton Primary Care Centre is over 350m from the bus stop, meaning that residents would have a combined 1.5km walk if they use the bus to get to/from the Balderton Primary Care Centre. The Doctors at Long Bennington is over 460m from the bus stop, meaning that residents would have a combined 1.72km walk if they use the bus to get to/from that Doctors.

The nearest secondary school is at Fernwood which is part of the Newark Urban Area. The closest employment is also at Fernwood; this is why the ‘Land around Fernwood’ sustainable urban extension is a more appropriate location for balanced growth and development.

The site does not reinforce local distinctiveness or the character of the village. It is designed as a bolt-on to the village which does nothing to achieve social cohesion and visual integration. It poorly relates to the existing settlement pattern and would result in the urbanisation of Doddington Lane which is a narrow rural lane. It would result in harm to the established rural character of Doddington Lane and would harm the medieval ridge and furrow landscape that forms the gateway to the southern approach to Claypole.

The site is part of the identified ‘Earthworks of medieval ridge and furrow, to the south-east of Claypole’ on the Historic Environment Record. This ridge and furrow landscape has the HER Number: 30794. The HER describes this as: *“Earthworks of medieval ridge and furrow to the south-east of Claypole, identified on aerial photography by the National Mapping Programme.”*



Historic Environment Record Entry from Heritage Gateway © Historic England

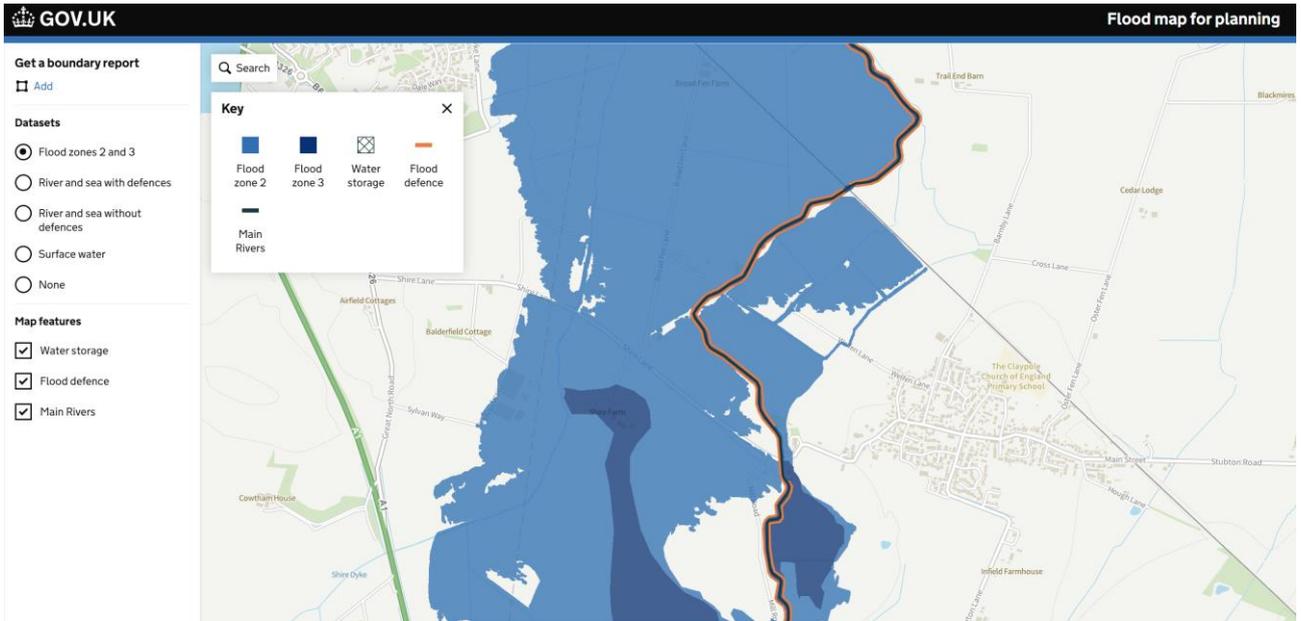
The Archaeological Report that supported a previous planning application on the allocation confirmed the presence of ridge and furrow earthworks. The site is part of a much wider area of Medieval (1066 AD to 1539 AD) ridge and furrow landscape to the south of the village. The setting of Claypole is derived in part from the ridge and furrow landscape which has been diminished to an extent by previous development. This is a historic landscape form that has heritage value as a heritage asset that should be protected. This is a factor that further weighs against the proposal. The proposal would harm the landscape heritage characteristics which define the setting of Claypole.

The proposal would result in the loss of a sizeable area of the remaining ridge and furrow landscape.

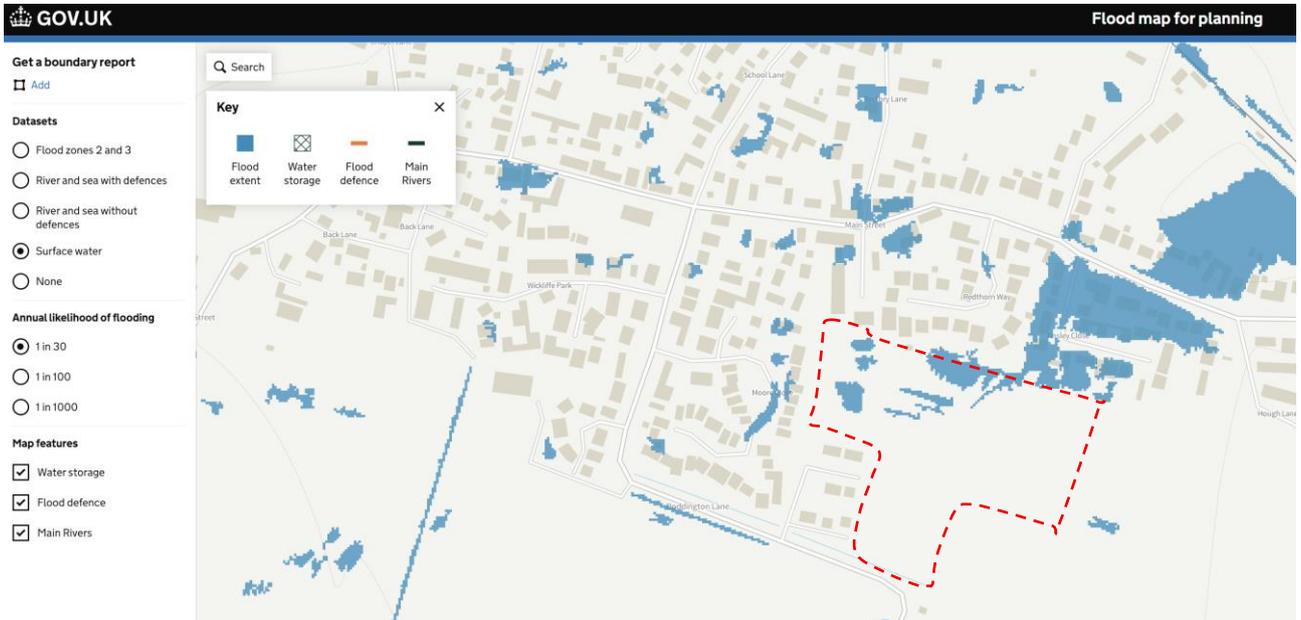
The NPPF in paragraph 135c) requires development to be sympathetic to local character and history, including the surrounding built environment and landscape setting. The proposal will not create a strong sense of place which creates development that respects the historic landscape setting of the village or integrates into the existing built form character. In addition, the proposal fails to recognise the intrinsic character and beauty of the countryside as required by paragraph 187b) of the NPPF.

Flood Risk

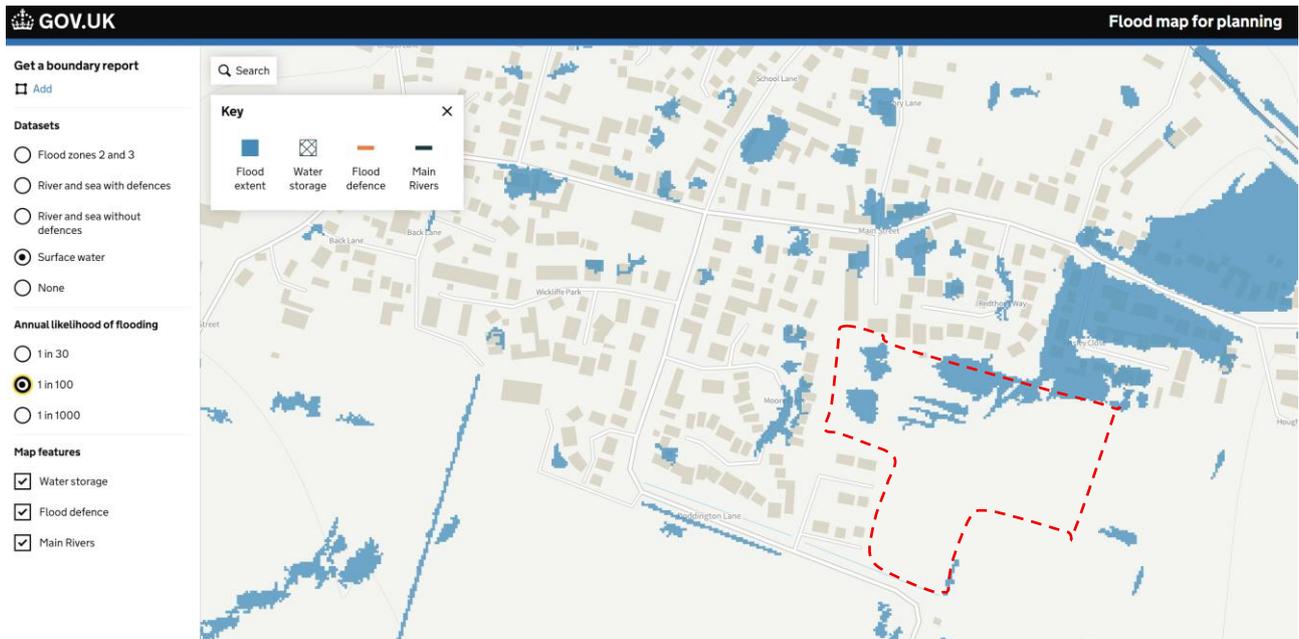
Given that flood risk changed substantially in the first quarter of 2025 through the production of the National Flood Risk Assessment by the Environment Agency; which led to the launch of updated data in the Flood Map for Planning in April 2025. The proposed allocation is partly at high, medium and low risk of surface water flooding.



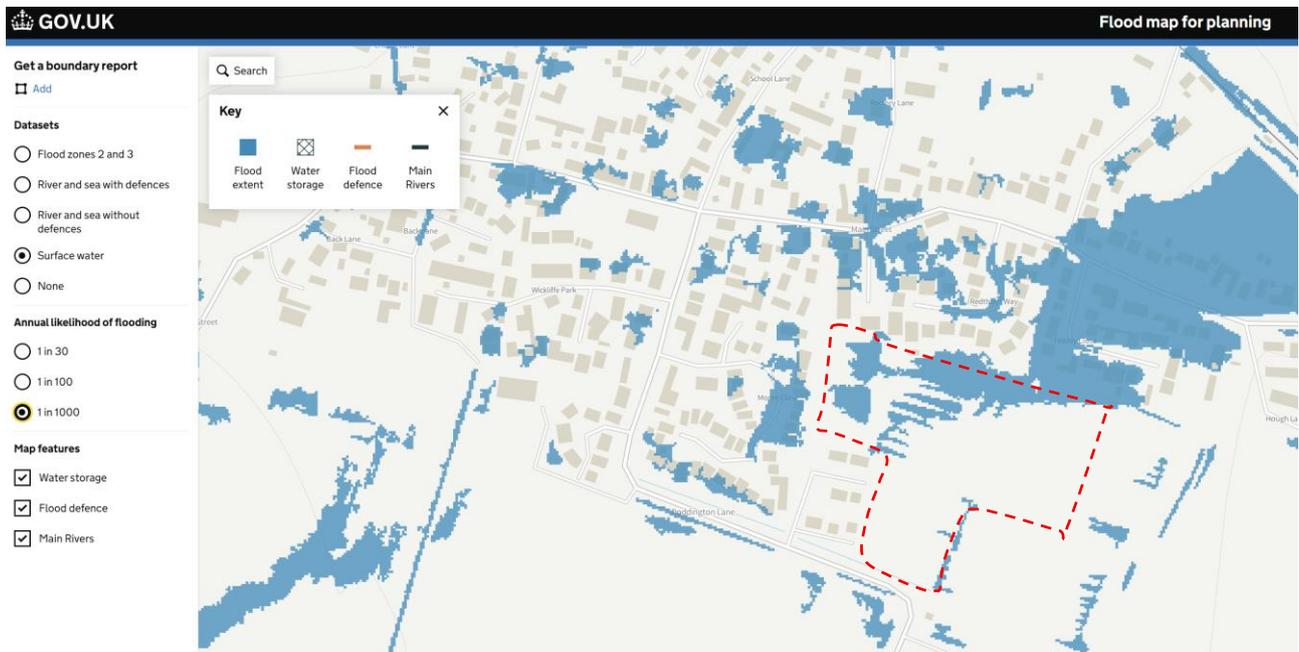
Flood Map for Planning (Fluvial)



Surface Water Flood Map - 1 in 30 Annual Likelihood (High Risk)



Surface Water Flood Map - 1 in 100 Annual Likelihood (Medium Risk)



Surface Water Flood Map - 1 in 1,000 Annual Likelihood (Low Risk)

Paragraph 172 of the NPPF states:

“All plans should apply a sequential, risk-based approach to the location of development - taking into account all sources of flood risk and the current and future impacts of climate change - so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:

- a) applying the sequential test and then, if necessary, the exception test as set out below;*
- b) safeguarding land from development that is required, or likely to be required, for current or future flood management;*
- c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and*

- d) *where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.*”

Paragraph 174 of the NPPF clearly states:

“Within this context the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test.”

No SFRA has yet been undertaken and no sequential approach has been applied to the site selection. Such a sequential approach would need to be undertaken across the District as a whole and take into account of flooding from all sources. Claypole is a settlement that is significantly and disproportionately impacted by surface water flood risk. There is no justification for looking to allocate a site that is at high and medium risk of surface water flooding when there are reasonable alternatives available elsewhere. Even in the limited sites assessed in Claypole, the site at Grove Farm on Hough Lane, because it is the only site not at risk of surface water flooding; would be sequentially preferable in flood risk terms.

Planning Practice Guidance (Reference ID: 7-023-20220825) states: *“The approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. This means avoiding, so far as possible, development in current and future medium and high flood risk areas considering all sources of flooding including areas at risk of surface water flooding. Avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures like flood defences, flood warnings and property level resilience features. Even where a flood risk assessment shows the development can be made safe throughout its lifetime without increasing risk elsewhere, the sequential test still needs to be satisfied.”* (Our emphasis)

It is therefore clear that the sequential test needs to be applied and met not just in relation to river (fluvial) flooding but also in respect to surface water flooding.

Planning Practice Guidance (Reference ID: 7-027-20220825) indicates that the sequential test is required in circumstances where the risk of flooding is high or medium from any source. Consequently, it would be required for this proposed allocation.

Planning Practice Guidance (Reference ID: 7-024-20220825) states:

“The Sequential Test ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites:

- *Within medium risk areas; and*
- *Then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas.”*

Surface Water Drainage

Drainage throughout Claypole is problematic. The clay soil which gives the village its name, becomes saturated in winter months and bakes hard during the summer.

Large areas of the old village, especially along Main St have no street drains. Flooding and damage from surface water are well documented throughout the village, not least on Main Street, the site of this proposed allocation, and adjacent areas.

We know from the topographical survey that accompanied a previous planning application on the proposed allocation that the field slopes from south to north (from 23.5m AOD to 20.1m AOD), down towards the houses of Redthorn Way and Tinsley Close. This slope means that surface water flooding occurs routinely along the northerly boundary during winter months when the field becomes saturated, and during summer months when the clay bakes hard. This corresponds with the areas shown to be currently at risk of surface water flooding.

The houses on Redthorn Way were constructed with an elevation of approximately two metres above the natural level of the previous paddock, and the gardens there, sloping towards the field, form a natural barrier to the flood water which gathers in the field at this point and drains towards the Tinsley Close properties.

In June 2006, despite the efforts of home owners and the Fire Service who were called to the scene and pumped water from gardens into the main drain, flood water entered the ground floor of 6 Tinsley Close which is at the lowest point of the gradient. Images at Appendix 2 show that currently flood water gathers where building is proposed to take place. Notwithstanding the existing topographical levels, where the attenuation pond is currently proposed is not where water currently collects naturally.

These images, taken in March 2019, shows the build-up of flood water at the lowest point of the field after unexceptional rainfall.



Images from floods of June 2006:



Pedestrian Accessibility and Safety

The proposed allocation is served by only one pedestrian connection via a single narrow footpath alongside Coulby Close which looks more like a path to a front door rather than a main connecting thoroughfare. The only road access is off Doddington Lane which is a narrow single carriageway road without any current footway and the proposed footway will have a pinch point and will be unlit.

The site lacks safe pedestrian integration as future occupiers will have to enter/exit the site on foot via the single narrow footpath alongside Coulby Close or a footway that will have a narrow pinchpoint on the corner of Doddington Lane. Coulby Close only has a footway on the western side which does not connect to any footway on Main Street as to the west of Coulby Close the property frontages provide a break in the footway. Also, to the east of Coulby Close the footway does not reach the Close. Therefore, future occupiers will need to cross Main Street to use the footway on the northern side. There is no dropped kerb crossing present on the northern footway making crossing here unsuitable for anyone with mobility difficulties. This crossing is also adjacent to a crossroads which reinforces the potential for vehicle and pedestrian conflict.

In addition, as most of the services and facilities in the village are north of Main Street, pedestrian crossing would be necessary. It would also be necessary to cross Main Street in order to access the bus stop to the west, including a second crossing back across Main Street to catch the bus to Newark. Lacking proper connectivity puts up barriers to the use of sustainable modes of transport which is likely to increase reliance on the use of the private car even for short local journeys.

The proposed allocation is not particularly accessible by public transport, cycling and walking and the barriers to pedestrian connectivity do not promote and assist journeys by public transport, cycling, mobility aids and walking. The pedestrian connections are not accessible, safe, convenient and as attractive as possible.

Highway Safety

Vehicular access via Doddington Lane will increase the number of vehicles using the single width stretch of the road. An additional 86 dwellings are likely to generate 200 or more extra vehicles / journeys per day causing more congestion and risks to pedestrian and driver safety. The bend south of Peacocks Launde means that road users heading south or west cannot see approaching vehicles from the other direction, as such vehicles have to pass on the single width stretch of road. Vehicles regularly overrun the inside grass verge at this point due to the poor forward visibility and narrowness of the carriageway.

Due to the perfectly reasonable desire of existing residents of terraced properties along Main Street to park their cars outside their homes, a significant stretch of Main Street on a daily basis effectively becomes a single-track road. This is particularly the case from Bes Cottage 59 Main Street to Birchtree Cottage 83 Main Street. This problem is exacerbated by parking changing to the opposite side of the road at numbers 70 to 76 Main St at the junction with Barnby Lane, and again changing sides as cars park for the village shop.

Main Street is therefore a pinchpoint for traffic movements, as the majority of households in Claypole are located to the eastern and southern part of the village - specifically the Wickcliffe Park and Moore Close developments, dwellings on Doddington Lane, dwellings on School Lane and Rectory Lane, the continuation of Main Street, and the further roads branching off (Coulby Close, Redthorn Way, Tinsley Close, Osterfen Lane and Hough Lane). The pinchpoint part of Main Street is therefore routinely used by the vast majority of Claypole residents.

The on-street parking causes queues at either end of the pinchpoint as vehicles wait their turn to pass through. The parking either side of the road means that vision to the opposite of the parked vehicles is often obscured with the consequence that drivers sometimes proceed when there is no

room to do so, or become frustrated. Vehicles sometimes mount the pavement, pedestrians have been alarmed, and minor accidents have occurred when vehicles collide (wing mirrors etc).

The on-street parking restricts visibility for pedestrians crossing Main Street and for vehicles emerging from side roads. For example, vehicles emerging from Barnby Lane, whether to turn left or right, have their vision obstructed and have to negotiate their turn to move across queuing traffic with obvious risk. (See Appendix 3)

At the Doddington Lane junction with Main Street, cars waiting to travel in the Newark direction frequently park across Doddington Lane, obstructing on-coming traffic that may want to turn right into Doddington Lane, or traffic from Doddington Lane wanting to move straight on into School Lane

This junction is a four-way crossroads, due to the above, vehicles pulling out from Doddington Lane and turning left, frequently halt for on-coming traffic, causing a dangerous situation for cars moving forward on Main Street.

When slow moving vehicles enter the narrowed stretch of Main Street, traffic then comes to a halt. This may occur with large farm vehicles, and especially when the refuse collection moves slowly along Main Street.

At the Doddington Lane crossroads, there is particular concern at appropriate times of day for the safety of young school children walking from Wickliffe Park and from Moore Close to the primary school on School Lane. Parents have made repeated representations to the Parish Council for safety measures that are beyond our capacity to provide.

There are additional safety concerns at Doddington Lane in the early morning and late afternoon when each of the *four* school buses taking children to secondary schools stop to pick up or drop off children. At these times, especially dark winter months, and with generally dark-coloured school uniforms, there a very real concerns for the safety of children as they negotiate cars and other vehicles using Doddington Lane.

Settlement Hierarchy

The NPPF in paragraph 11a) in relation to plan making and sustainable development states: *“all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;”*

The NPPF continues in paragraph 16 to state:

“Plans should:

a) be prepared with the objective of contributing to the achievement of sustainable development;”

In fact, this is a legal requirement of local planning authorities exercising their plan-making functions under section 39(2) of the Planning and Compulsory Purchase Act 2004.

The NPPF does not set out national policy on developing a settlement hierarchy per se. In paragraph 97e) it highlights the need to: *“ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.”*

Paragraph 109 of the NPPF continues:

“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can

help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”

As such the NPPF is clear that sustainable development includes the three strands of economic, social and environmental themes; plus, there is a need to balance housing, employment and services and facilities. The NPPF is explicit that patterns of growth that flow from a settlement hierarchy needs to take into account sustainability of a location which includes the accessibility of that location which includes a genuine choice of transport, which includes public transport.

Current Local Plan Examination

The report titled: Update: Proposed Settlement Hierarchy for new Local Plan put to the Executive Strategic Planning Day Committee in February 2017 explained the methodology used to develop the existing settlement hierarchy.

This report explained that the Larger Villages list was broadly similar to the previously defined Local Service Centres (LSCs) in the previous South Kesteven Core Strategy. It explained that the main changes were that previously some LSCs were formed of two settlements that did not immediately abut each other, in the new assessment only two settlements that abutted each other were considered as a single entity. It also explained that the village of Castle Bytham which was a LSC did not qualify as a Larger Village. This was because the new methodology required Larger Villages to have a village shop and primary school, as a minimum which Castle Bytham did not have. Under the former Core Strategy Claypole was not an LSC.

The report also explained: *“Whilst some of these settlements might have scored the same as other settlements that are recommended for consideration as larger villages, these settlements did not have all the essential criteria present to be deemed suitable for larger village status.”*

That committee report underpinned what then became the South Kesteven District Council Local Plan 2011- 2036 - Settlement Hierarchy Review [Report](#)⁴ in May 2017.

The methodology used for the current Local Plan in the committee report scored settlements including the local businesses category and excluding it. Claypole scored 29 including that category and 27 excluding it. In the final report the scores including the local business category were used.

The May 2017 report also contained a number of anomalies. In particular Table 1 on Page 4 set out a scoring mechanism that indicated that primary schools and local shops would be scored 4 for full-time and 2 for part-time, with an additional facility scoring 2. However, in Appendix 2 and 3 on pages 44 to 46 the scoring used seems to have scored 6 for full-time with an additional facility scoring 3, and the score being discounted to 3 for a part-time facility in these categories. A further anomaly was that a Church/Chapel was listed as an essential facility in Table 2 on page 5, but the actual scoring matrix in Appendix 3 did not include such reference. The change of scoring for primary schools and local shops appears to have been based on the whim of members and not any robust evidence.

The scoring methodology utilised a mixture of essential and desirable criteria, these were set out in Table 2 of the May 2017 report on page 5 as follows:

⁴ https://www.southkesteven.gov.uk/sites/default/files/2023-08/HOU5_Settlement_Hierarchy_Review.pdf

Table 2: Core Strategy Criteria

Essential Services / Facilities	Desirable Services / Facilities	Other Services / Facilities
Primary School	Secondary School	Equipped Play Area
Food Shop / Local Shop	Train Station	Petrol station / Garage
Village hall / Meeting hall	Bus Service (1-3 Hours, 4-6 per day)	Mobile library
Bus Service (Hourly or More)	Local Business	Allotments
Church / Chapel	Doctors (Part Time)	Bus (3 hours or Less)
Post Office (Full Time)	Post Office (Part Time)	
Public House	Day Nursery, pre-school or crèche	
Doctors (Full Time)		
Recreation Space		

Extract from Existing Local Plan Settlement Hierarchy Assessment

The existing methodology was not based on a simple score achieved, it was based on the service role of the settlement and the availability of essential facilities, including public transport. Whilst neither the committee report nor the May 2017 report explained why Claypole was not made a 'larger village', Appendix 2 greys the public transport boxes for both Allington and Claypole. As such it would appear that the lack of availability of bus services in Claypole was determinative.

Against the criteria in the above table Claypole would not have had a number of the essential services and facilities or the desirable services and facilities as follows:

Table 2: Core Strategy Criteria

Essential Services / Facilities	Desirable Services / Facilities	Other Services / Facilities
Primary School Y	Secondary School N	Equipped Play Area Y
Food Shop / Local Shop Y	Train Station N	Petrol station / Garage N
Village hall / Meeting hall Y	Bus Service (1-3 Hours, 4-6 per day) N	Mobile library Y
Bus Service (Hourly or More) N	Local Business Y	Allotments Y
Church / Chapel Y	Doctors (Part Time) N	Bus (3 hours or Less) Y
Post Office (Full Time) N	Post Office (Part Time) N	
Public House Y	Day Nursery, pre-school or crèche N	
Doctors (Full Time) N		
Recreation Space Y		

Extract from Existing Local Plan Settlement Hierarchy Assessment for Claypole

The current Local Plan was examined by David Spencer *BA(Hons) DipTP MRTPI*, an Inspector appointed by the Secretary of State. In his [report](#)⁵ he summarised the main requirement for the need for an early review of the Local Plan as follows:

⁵ https://www.southkesteven.gov.uk/sites/default/files/2023-08/FINAL_INSPECTORS_REPORT_0.pdf

“A policy commitment to undertake an early plan review to address, amongst other things: (i) latest needs of gypsies and travellers; and (ii) an updated assessment of employment land requirements; and (iii) changing circumstances in local housing need.”

The Inspector who examined the current Local Plan did not find any reason for the spatial strategy or settlement hierarchy to be included in the early review of the Local Plan per se.

In his report of the examination the Inspector stated in paragraph 57:

“Across the district there are a number of larger villages with a reasonable level of services and accessibility. These have been systematically assessed against recognised criteria, principally through the 2017 Settlement Hierarchy Report. As a result, Policy SP2 appropriately identifies 15 larger villages where it would be reasonable to allocate a moderate level of development to provide further housing choices at locations where there are existing levels of day-to-day services. Notwithstanding the proximity of some villages to neighbouring towns in other districts I am satisfied that no obvious candidate settlements have been omitted from the larger villages tier.”

The Inspector continued in paragraph 58 of his report to address the objection at that time to the settlement hierarchy and he stated:

“The inclusion of Barrowby as a larger village for growth is disputed but I find the assessment in the Settlement Hierarchy Report to be robust.”

The unsoundness the Inspector found with the settlement hierarchy was the absence of including a list of the small settlements as a category in the settlement hierarchy. The Inspector addressed this in his report at paragraph 61, where he stated:

“To resolve this soundness matter, the Council has produced a comprehensive addendum to the Settlement Hierarchy Report which applies a cogent process to identify 60 logical settlements within this tier. The criteria and thresholds applied are reflective of local circumstances in South Kesteven and do not need to be drawn more loosely to include very small hamlet scale settlements.”

The starting point for the Local Plan Review is therefore that the LPA proposed the settlement hierarchy in the current Local Plan which was based on the role of the settlement and the presence of a range of essential services and public transport on the basis that it was appropriate at that time. That conclusion was then endorsed independently by the Inspector who examined the current Local Plan on the basis of the evidence put forward, that endorsement included that Claypole was correctly identified as a ‘small village’.

Evidence Base Changes

It is only appropriate to review a settlement hierarchy either because of a significant change of circumstances, a policy intervention or because a completely different methodology and policy approach is pursued. As I have already advised Claypole Parish Council there is no rationale based on cogent or substantive evidence put forward for the escalation of Claypole from a small village to a larger village.

The current Local Plan was adopted in January 2020 and during the intervening four-year period, there has been no changes in local services and facilities in Claypole or to the role and function that Claypole performs. The last change in local services and facilities was the opening of The Side House Café in the side of the village hall which took place in December 2018.

The opening of the café post-dated the May 2017 Settlement Hierarchy Review [report](#)⁶ but pre-dated the Settlement Hierarchy Update 2019 [report](#)⁷ done during the Local Plan examination. As such there has been no changes to local services and facilities since the previous evidence base

⁶ https://www.southkesteven.gov.uk/sites/default/files/2023-08/HOU5_Settlement_Hierarchy_Review.pdf

⁷ https://www.southkesteven.gov.uk/sites/default/files/2023-08/JH-_Smaller_Settlement_Report_Draft_2.pdf

was put to the Local Plan examination. This further calls in question the lack of any rationale to underpin the change made in the emerging Local Plan Review. In any event in no way could the opening of a café mean that a hitherto small village should suddenly become a larger village.

Engagement

The NPPF in paragraph 16 identifies that:

“Plans should

- a) be prepared with the objective of contributing to the achievement of sustainable development;*
- b) be prepared positively, in a way that is aspirational but deliverable;*
- c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees...”*

South Kesteven have not undertaken early effective engagement with residents of Claypole or the Parish Council regarding the change in the settlement hierarchy. Waiting until the formal nature of the Regulation 18 consultation is not an effective way of engaging over this matter when it is presented in the form of a fait-accompli. This is particularly important given the extremely low levels of direct community engagement of local residents in Local Plans.

As you will be aware the NPPF in paragraph 29 emphasises that neighbourhood planning gives communities the power to develop a shared vision for their area. Claypole Parish Council have recently completed the long and tortuous process of producing the Claypole Neighbourhood Plan. That Neighbourhood Plan is predicated on Claypole being a ‘small village’ and it was endorsed by the local community through a Referendum.

The Neighbourhood Plan Referendum had a turnout of 33.5% with an overwhelming Yes vote of 95.9%. A Neighbourhood Plan is the only type of Local Authority plan that specifically has to be endorsed by a public vote. Through that Referendum the local community by voting Yes endorses the policies, strategy, allocations etc. contained in the Neighbourhood Plan. Both Claypole Parish Council as the qualifying body and South Kesteven DC as the LPA have legal interest in the Neighbourhood Plan. That Referendum took place only 6 months ago and South Kesteven is now effectively seeking to ignore the Referendum by seeking to change the status of Claypole in the settlement hierarchy. This raises fundamental questions with regard to public accountability and the democratic role of Neighbourhood Planning.

In the last electoral ward review, South Kesteven had a declared electorate estimate of 119,944, if the Local Plan Review were to achieve direct engagement with 33.5% of the electorate, then that would involve some 40,181 residents. The Local Plan Review will not achieve direct engagement with anything like that number of residents. Neighbourhood Plans where they exist are based on direct community engagement with an exceptional proportion of local residents and their wishes must be afforded exceptional weight.

Cross Boundary Issues

The NPPF in paragraph 24 states:

“Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.”

The Parish Council has long raised the need for the planning strategy for Claypole to consider the cross-boundary relationship between the village and the Newark Urban Area; which lies in the neighbouring county of Nottinghamshire and the neighbouring district of Newark & Sherwood. There is no evidence in the Local Plan Review that South Kesteven has considered this inter-relationship.

The Claypole Neighbourhood [Plan](#)⁸ through Policy 4 (Newark Urban Area Buffer) explores in detail the inter-relationship between Claypole and the Newark Urban Area. It should be noted that SKDC supported this policy in principle. The Independent Examiner for the Neighbourhood Plan Andrew Ashcroft BA (Hons) MA DMS MRTPI queried in his clarification [note](#)⁹ with both SKDC and with the Parish Council whether this inter-relationship was a strategic matter that should be addressed in the Local Plan Review. The Independent Examiner noted therefore the strategic nature of the inter-relationship between Claypole and the Newark Urban Area.

The Independent Examiner in his [report](#)¹⁰ in paragraph 7.30 stated:
“This is a very distinctive policy which addresses a matter of considerable importance to the local community. It comments about the relationship between the village and Fernwood to its north and west. The expansion of Fernwood is central to the Newark and Sherwood housing strategy and numerous planning permissions have been granted for the expansion. The Plan comments that the development of Fernwood will impact on the rural and village nature of Claypole, bringing the village physically closer to the Newark conurbation with only 1km between the eastern edge of Fernwood and the western edge of Claypole.”

He continued in paragraph 7.32 to state:

“I looked at the proposed buffer area very carefully during the visit. I saw the importance of the proposed buffer area. I also saw the limited distance between Fernwood and Claypole. On the balance of the evidence, I am satisfied that a policy of this nature is both appropriate and would serve a clear purpose.”

Given the fact that the Claypole Neighbourhood Plan has important policies and content relating to the inter-relationship between Claypole and Newark, the Local Plan Review needs to carefully consider this inter-relationship. The views and conclusions of the Independent Examiner as to the strategic importance of this inter-relationship adds further weight to the need for the Local Plan Review to consider this in relation to the settlement hierarchy.

This is a longstanding matter of fundamental importance to local residents as demonstrated in early consultation on the Neighbourhood Plan and past planning applications. The allocations around Fernwood in Newark & Sherwood were first drawn up in the late 2000s, being first allocated in the Newark & Sherwood Core Strategy in 2011.

Retaining the separate village identity of Claypole and addressing the threat of coalescence to the Newark Urban Area is a matter which is a primary concern for many local residents such that any Neighbourhood Plan that did not address this matter would have been at risk of not being supported at Referendum.

Claypole has a particular functional and spatial relationship with the Newark Urban Area, it operates as one of the ring of first villages from the Newark Urban Area. Residents of Claypole look to Newark to provide their employment and higher order services and facilities. The primary school at Claypole also has pupil numbers greater than the normal catchment would provide because Newark Urban Area residents utilise the primary school as the opportunity to gain access to the Lincolnshire grammar schools for their children.

South Kesteven have had an opportunity to consider the cross-boundary relationship to the Newark Urban Area but have failed to acknowledge this in the current South Kesteven Local Plan to 2036. SKDC in their Local Plan do consider the cross-boundary relationship of Stamford

⁸ <https://www.southkesteven.gov.uk/sites/default/files/2023-12/Claypole%20Neighbourhood%20Plan%20%28Made%20Plan%29%5B9%5D.pdf>

⁹ https://www.southkesteven.gov.uk/sites/default/files/2023-08/Claypole_Neighbourhood_Development_Plan_-_Clarification_Note.pdf

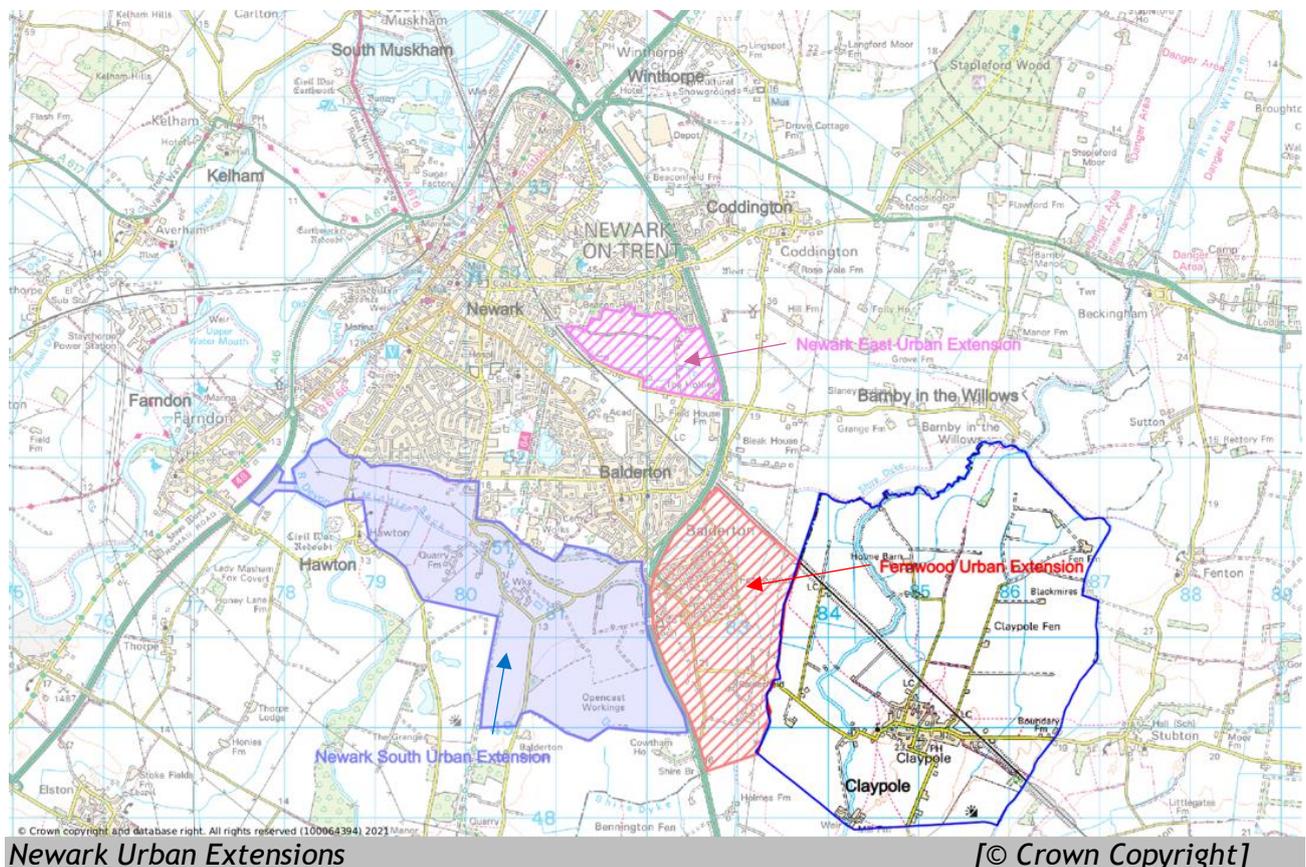
¹⁰ https://www.southkesteven.gov.uk/sites/default/files/2023-08/Claypole_Neighbourhood_Development_Plan_-_Examiner%27s_Report.pdf

because South Kesteven are dependent upon Rutland delivering half of the proposed urban extension to Stamford.

The Regulation 18 draft South Kesteven Local Plan Review still does not indicate any desire on the part of South Kesteven to address the cross-boundary relationship to the Newark Urban Area. In this respect the Local Plan Review fails to have been positively prepared.

The Newark Urban Area is the main employment and commercial centre, and transport hub for Claypole residents. Newark is located within the adjacent district of Newark and Sherwood, and it is an identified 'Sub-Regional Centre'. It is identified for strategic growth which includes three strategic urban extensions all on the Claypole side of Newark which have been identified in their 2019 Amended Core Strategy as being phased to cater for housing need up to 2033 and indeed beyond.

During the plan period the three strategic urban extensions will deliver 4,885 dwellings, with a further 2,465 dwellings phased for post 2033. In strategic terms therefore the Newark area has an oversupply of allocated housing for current requirements.



One of the three strategic urban extensions is 'Land around Fernwood' for some 3,200 dwellings (2,095 up to 2033 and 1,105 post 2033). This strategic allocation abuts the Claypole Parish boundary as shown on the plan below. Of the 3,200 new homes allocated for Fernwood, around 2,150 of them will be either side of Claypole Lane (as referred to in the Newark & Sherwood Core Strategy but is actually called Shire Lane on OS maps). As such the future planning of Claypole need to take into account the inter-relationship to Fernwood and the whole Newark Urban Area.

The expansion of Fernwood is central to Newark & Sherwood housing strategy and numerous planning permissions have been granted for the expansion. The development of 'Land around Fernwood' will impact on the rural and village nature of Claypole, bringing the village physically closer to the Newark conurbation with only 1km between the eastern edge of Fernwood and the western edge of Claypole.

Given this strategic development immediately adjacent to the parish boundary which is proposed to be developed in the plan period; there is a threat of coalescence by creeping development.

The Newark Urban Area has had an open break type of designation as a longstanding policy approach to prevent Newark coalescing with the first set of villages that lie around the town. This approach has been present, in some form or other, within each successive Statutory Development Plan covering the Newark Area - from the Newark Town Map (amendment to the County Development Plan) produced in 1964 onwards. Throughout this time its principal purpose has been to prevent the coalescence of Newark with neighbouring settlements by restricting development on the intervening land.

The Newark Urban Area Buffer in the Claypole Neighbourhood Plan now complements and operates as part of the network of open breaks around the Newark Urban Area, with the other designations being between the Newark Urban Area and Farndon, Winthorpe and Coddington. This cements the commonality of policy approach between Claypole and the other villages that form the first ring of settlements around the Newark Urban Area.

Claypole lies within the Trent and Belvoir Vale landscape character area described in the South Kesteven [Landscape Character Assessment](#)¹¹ as: *“This area lies to the northwest of the District. It is described as a gently undulating landform, with shallow ridges dropping down gently to broad river valleys. It is an open, arable or mixed, farmed landscape, strongly rural in feel, with trimmed hedges and few hedgerow trees; woodlands are only locally significant. These are frequent nucleated villages with red brick houses, roofed with pantiles, and spired churches prominent in long views.”*

The topography and landform of Claypole and the land to the north and west is flat river valley which provides extensive views. The land use is largely agricultural with the soils being Grade 3 agricultural land. The Character Assessment identifies the key characteristics as:

- A relatively simple, medium to larger-scale, open arable or mixed farming landscape
- Flat or very gently undulating topography
- Simple regular fields enclosed by hawthorn hedges
- Relatively few hedgerow trees and virtually no woodland
- Small villages typically located on slightly rising land
- Church towers and spires visible across the landscape.
- Buildings styles vary, but a high proportion of brick with dark red pantiles

In the Trent and Belvoir Vale landscape character area the settlement pattern and form comprise a network of small clustered villages dispersed through the area. The landscape character is a gentle landform, of open or arable or mixed farmland, which creates a strongly rural feel. The landscape is medium to larger in scale, with relatively simple regular fields, frequently enclosed by hawthorn hedgerows. The hedgerows are in places fragmented. There are relatively few hedgerow trees and virtually no woodlands. Tree cover is most noticeable around the villages, which are typically situated on slightly rising ground.

At a cross-boundary level, the other villages around Newark including Winthorpe, Coddington and are also located within National Character Area 48 Trent and Belvoir Vales. There is further commonality therefore with the other settlements around Newark that lie within Newark & Sherwood.

Claypole operates as part of the ring of first villages encircling the Newark Urban Area. The single continuous built form of the Newark Urban Area will now abut the Parish boundary of Claypole. The growth of Fernwood is now underway with planning permissions having been granted and development has physically commenced including by Allison Homes and David Wilson/Barratt.

¹¹ <http://www.southkesteven.gov.uk/CHttpHandler.ashx?id=2117&p=0>

Claypole is the only settlement in the first ring of settlements around the Newark Urban Area that lies outside of Newark and Sherwood. Nonetheless, it is appropriate for Claypole to operate in a policy terms with commonality to the other settlements in the first ring around the Newark Urban Area. This needs to be factored into the settlement hierarchy.

Newark & Sherwood Settlement Hierarchy

Given the fact that Claypole is part of the ring of the first settlements surrounding the Newark Urban Area, it is appropriate to consider how the Newark & Sherwood Amended Core [Strategy](#)¹² sets out its settlement hierarchy.

Newark & Sherwood have identified their settlement hierarchy to allow the Council to plan positively for future development within the District. It defines which settlements are central to the delivery of the Council's Spatial Strategy.

As they explain in paragraph 4.7 of their Amended Core Strategy:

“Following a review of settlements and service provision in the District, the following key conclusions have emerged:

1. Services, such as employment and secondary education, are focused in settlements which serve a rural hinterland and/or a larger local population.

2. There are a number of villages which have a range of services which attract people from the local area, such as libraries and doctor's surgeries.

3. Beyond these villages are a range of villages which have a limited range of services, some of which have a primary school and other shops and facilities.

4. A larger number of villages have no facilities beyond a public house or a village hall but are well related to settlements which have a wider range of facilities.

5. Public transport is focused on key routes between Newark, Mansfield, Nottingham, Southwell and Ollerton & Boughton.”

Newark & Sherwood have therefore defined the identification of three complementary settlement roles which will be central to the delivery of the District's Spatial Strategy; these are:

- Sub-Regional Centre
- Service Centre
- Principal Village

The Newark Urban Area (Newark, Balderton and Fernwood) is identified as a Sub-Regional Centre; it is the largest population centre in the District and is the main location for services, jobs, retail, education and a focus for transport for most of the District.

As paragraph 4.10 of their Amended Core Strategy explains:

“Below Newark Urban Area, a number of settlements provide important services both to their own communities and to a wider hinterland; they are Service Centres.” These are Ollerton & Boughton, Southwell, Rainworth, Clipstone and Edwinstowe.

As paragraphs 4.12 and 4.13 of their Amended Core Strategy goes on to explain:

“The District Council also has a range of communities which have a range of local services which meet day to day local needs and complement the role of the Service Centres. These are defined as Principal Villages.

A range of other communities exist below the three identified settlement categories. They are referred to in the hierarchy as Other Villages in Newark & Sherwood.”

¹² <https://newark-sherwooddc.gov.uk/amendedcorestrategy/>

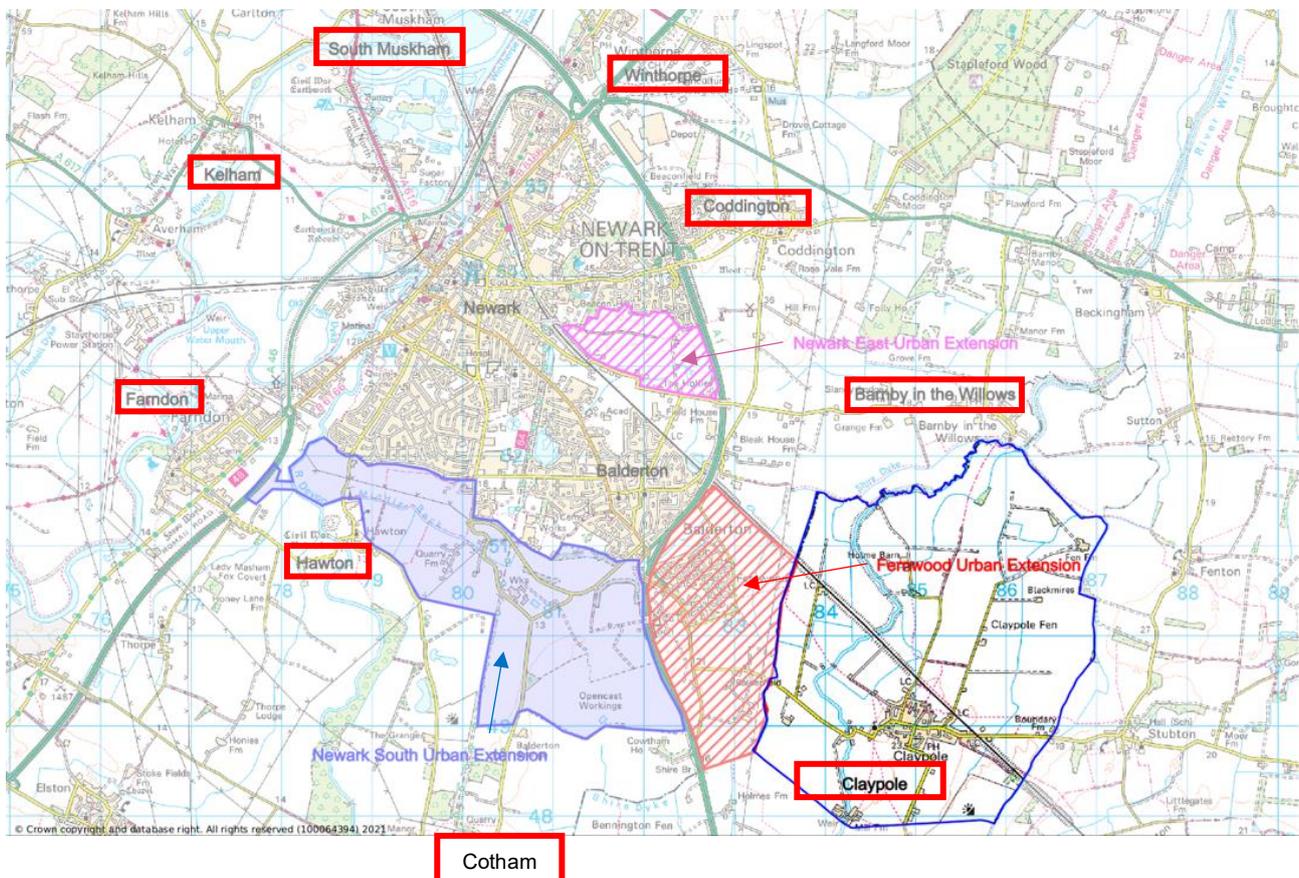
The Principal Villages in Newark & Sherwood are Bilsthorpe, Blidworth, Collingham, Farnsfield, Lowdham and Sutton on Trent.

It is notable that all of the settlements in the first ring around the Newark Urban Area are classified as ‘other villages’, the lowest category of settlement. This includes Farndon and Coddington which are larger in population than Claypole, having a 2021 Census population¹³ of Farndon - 2,500 and Coddington 1,700. The 2021 census population for Claypole is 1,400.

Farndon has an extensive array of services and facilities including a Primary School, Day Nursery, Village Hall, Recreation Ground, Play Area, Cricket Pavilion, 3 x Pubs, Café, Farm Shop, Garden Centre, Convenience Store, Post Office, ATM, Fishing Store, 2 x Vehicle Repair Garages, Marina, Sea Scouts Hall, Chandlery, Church, Nursing Home and Ceramics Shop. Farndon also has significant floorspace of employment units and has a high frequency bus service to Newark and Nottingham.

Coddington has a smaller number of services and facilities but includes a Primary School, Village Hall, Community Centre, Church, Playing Field, Play Area, Football Ground, 2 x Pubs, Allotments, Scouts Hall and Outreach Post Office. Coddington Parish is also home to Newark’s largest employer Currys, and it has a high frequency bus service to Newark.

Despite their size and services and facilities, Newark & Sherwood have categorised both Farndon and Coddington in the lowest category of ‘other villages’ in their settlement hierarchy to protect their separate identity from Newark, to prevent coalescence and development pressure on the open breaks and to ensure that the focus of development in the area is within the Newark Urban Area and the strategic extensions planned. This is a deliberate policy choice which the suggested South Kesteven settlement hierarchy now conflicts with and undermines.



First Ring of Settlements Around the Newark Urban Area

[© Crown Copyright]

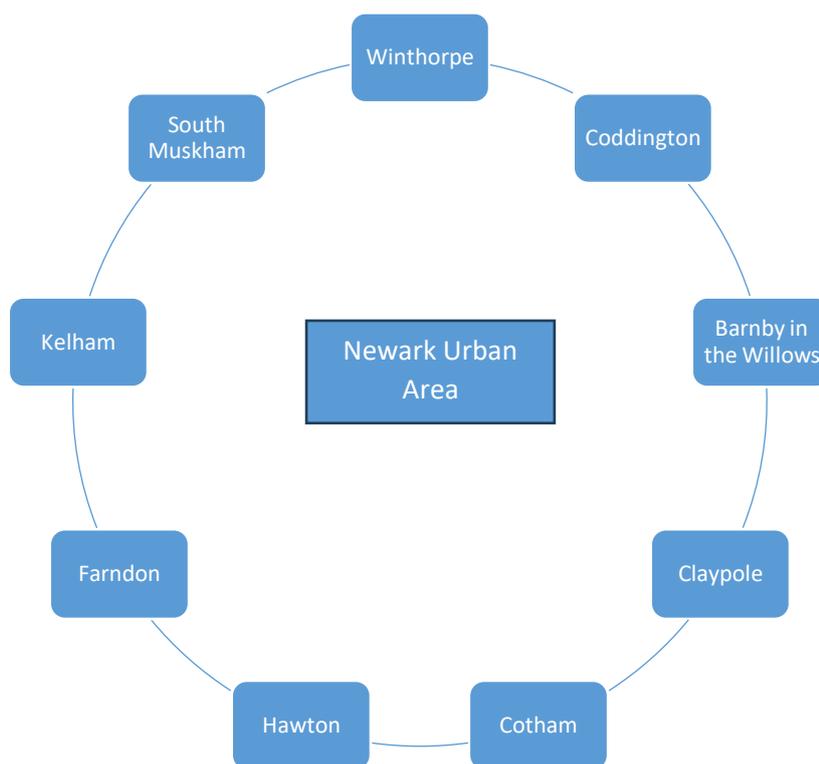
¹³ Note all 2021 Census area profile population figures are rounded to the nearest 100 by the ONS

In the Newark and Sherwood Amended Core Strategy, examination [report](#)¹⁴ the Inspector Paul Griffiths *BSc(Hons) BArch IHBC* in paragraph 18 concluded:

“Following the hearings, I confirmed that in my view, the general strategy of the Plan, in relation to the proposed distribution of new housing and the settlement hierarchy, in directing the majority of the development envisaged to places that are most accessible, and best served by facilities, is, in principle justified, bearing in mind the Spatial Vision of the Plan, its Strategic Objectives, and the OAN.”

The settlement hierarchy approach around the Newark Urban Area has now been endorsed twice by the Inspector who dealt with the original Newark and Sherwood Core Strategy (2011) and by the Inspector who examined the Amended Core strategy (2019).

Given the commonality between Claypole and the other villages in the first ring of settlements around the Newark Urban Area, the Parish Council has consistently argued that Claypole should be addressed in a similar way to the other settlements. To achieve this would mean that a common policy approach should be pursued with Claypole remaining a ‘small village’ in the South Kesteven settlement hierarchy. Claypole is equally dependent on Newark to provide local employment and higher order services and facilities and has the same functional and spatial relationship. Just because there is a County boundary doesn’t mean that Claypole doesn’t operate in the same way as the other settlements that form the nine spokes of the wheel of Newark which is shown in the diagram below.



Nine Spoke Wheel of Newark

Scoring

It is clear from looking at the Village Survey Scoring Results that the answers provided from Parish Council clerks differs in their interpretation of the various categories. The survey was also undertaken in 2021 which is now 3 years old and represents an out-of-date evidence base.

¹⁴ <https://newark-sherwooddc.gov.uk/media/newark-and-sherwood/images-and-files/planning-policy/pdfs/publication-amended-core-strategy/NSACSIInspectorsReport.pdf>

The approach has resulted in inconsistency, for example is the category of local businesses meant to include home-based businesses and farms or is it meant to include defined local employment buildings and sites. There are also other inconsistencies and errors that are immediately obvious from just a cursory look at the scoring. This seriously calls into question the robustness of the survey, the lack of any quality control or audit process and therefore its suitability as evidence base to underpin the Local Plan Review.

The scoring in the new Village Survey Scoring for Claypole contains factual errors as follows:

- Bus Service - Claypole scores 4, this implies that the village has a frequency of buses greater than one per hour. In fact, Claypole only has three daytime bus services each way Monday to Saturday and the Call Connect service. Therefore, the score should be 2, which is then discounted to 1 for a part-time service because it doesn't operate every day
- Local Businesses - Claypole scores 1, this implies that the village has less than 10 local businesses. However, it is noted that Thurlby and Northorpe for example scores 0 on the basis that it has no local businesses. Thurlby and Northorpe does have numerous home-based businesses and farms according to Google Maps, but these are not included. In Claypole the response from the Parish Council listed four family home-based businesses, which to be consistent with the scoring for Thurlby and Northorpe for example means that the score should be reduced to 0
- Other Services - Claypole scores 4 which from the Parish Council return would appear to be a café, hairdressers, motor repairs and car sales. The scoring matrix does not indicate what should or shouldn't be counted under this heading. Under this heading the scoring suggests that Claypole has more other services than many of the other villages listed. Barkston for example only has one other service listed, but it has a petrol filling station, vehicle repair garage and used car sales. Clearly the latter two operations haven't been counted in their score. For Claypole, the motor repairs operation is home based rather than being in a separate purpose-built premises, and the car sales operation is outside of the village and appears to operate on an appointment type basis. As these two activities are not local services in the traditional sense and for consistency with other settlements, they should not be counted so the score should be reduced to 2

Overall, correcting the errors in the scoring this would reduce the scoring by bus service minus 3, local businesses minus 1 and other services minus 2. This would reduce the score for Claypole from 40 to 34.

It is unclear what is meant by part-time in relation to a public house, is that meant not open every day at some point or not open daytime (including lunch) and evening every day? At present Claypole scores 3 for a public house but the pub does not have daytime opening on Mondays or Tuesday so could potentially be judged part-time scoring just 1 point, dependent upon the criteria meant to be used.

The same lack of clarity as to what is meant by part-time in relation to a place of worship, is that meant as not having a service every Sunday (and festival)? At present Claypole scores 3 for a place of worship but only has two Sunday services per month, whereas for example Long Bennington Church has a service every Sunday and festival. Therefore, is in fact Claypole Church meant to be judged part-time scoring just 1 point, dependent upon the criteria meant to be used.

Methodology

The [methodology](#)¹⁵ used for the settlement hierarchy has evolved from that used to underpin the current Local Plan. It has introduced a new category of 'Place of Worship' into the scoring which has artificially increased the score for every village by a blanket 3 points; irrespective of opening

¹⁵ <https://www.southkesteven.gov.uk/sites/default/files/2024-02/Settlement%20Hierarchy%20Review%20February%202024.pdf>

times. Although it is noted that Baston incorrectly scores 0 when in fact it has St John, Baston Church so should score 3 on the same blanket approach taken, thereby increasing its score total to 42. Also, Long Bennington has a Church of England Church and a Methodist Church so its score of 3 for this category should in fact be 4.

That simple additional category of 'Place of Worship' has artificially increased the score for every village by a blanket 3 points, so even for Claypole the score of 29 used in the current Local Plan settlement hierarchy would increase to 32 which just coincidentally now exceeds the suggested threshold score of 30 to be a 'larger village'. Whilst a Church/Chapel was referred to in the current Local Plan settlement hierarchy report, it was not actually used in the scoring.

The methodology now being used is materially different to that used for the current Local Plan. It is therefore not the same methodology that was found to be sound by the Local Plan Inspector in the examination.

According to the flowchart in paragraph 2.14, the new methodology introduces an arbitrary score of 30 points which lacks any explanation as the first criteria, and it then introduces a second criteria of whether the settlement has a primary school and a local shop. If both criteria are met, then simply a settlement is deemed a 'larger village'. The current methodology didn't use a score threshold, but the minimum score for the 'larger villages' chosen was 32. With the simple addition of the additional category of 'Place of Worship' which has artificially increased the score for every village by a blanket 3 points, then that previous minimum score of 32 points would have been 35 points had it been included in the scores at that time.

Why in effect the entry level scoring has effectively been reduced down to 30 is not explained. In the current scoring the lowest score for the 'larger villages' is 36 (although as we explain later in fact Great Gonerby score should be increased to 37 because it has a mobile library), why for example is that score not used or why is 35 or 40 not used.

As identified earlier the scoring for Claypole is incorrect and should be reduced to 34 (or possibly to 30 if the pub and church are considered to be part-time), if the previous minimum score for the 'larger villages' that was 32 was increased by 3 points for the additional 'Places of Worship' category addition then if the threshold point was then 35; Claypole would be excluded and would remain a 'small village'.

There is also no explanation as to why good levels of public transport is no longer considered essential, or indeed why the list of 9 essential services and facilities set out in Table 2 of the methodology for the current Local Plan have now been reduced to just 2 essential services and facilities, namely a primary school and a local shop.

This now results in a position where for example Claypole and Barkston are the only suggested larger villages without a post office, which was previously considered an essential service and facility. If the Claypole score for bus services is corrected, then Corby Glen and Claypole are the only suggested larger villages reliant on the lowest level of bus services.

Focus on a primary school and a local shop being so important in the role of a settlement is rather perverse. For example, Great Ponton has a primary school, and it does in fact have a Premier Stores local shop at the Gulf filling station on the A1 which can be reached by the pedestrian overbridge. The scoring for Great Ponton fails to note the presence of the shop, but it contains these two essential services, although it lacks other services and facilities. Having these two services is not therefore reflective of the role and function a settlement actually performs.

Conversely, it means that a settlement such as Tallington with some 840 residential addresses (so bigger than many of the larger villages) is not deemed to be a larger village because at some point historically the Victorian primary school that was sited in Tallington got closed and became

the village hall, with the Victorian primary school in neighbouring village of Uffington remaining open.

The Local Plan Review is internally inconsistent, in the vision the Local Plan Review indicates that: *“Larger villages will continue to provide the necessary day-to-day services to ensure rural communities have choice in terms of homes, work and recreation.”* However, the scoring matrix does not include focus on the availability of local employment, nor the ability for residents to access local employment by public transport that runs at suitable times including early mornings and early evenings.

Policy SP1 (Spatial Strategy) continues that focus and states:

“Larger Villages will provide a supporting role in meeting the development needs of the District. Development should create strong, sustainable, cohesive and inclusive communities, making the most effective use of appropriate previously developed land (where possible) and enabling a larger number of people to access jobs, services and facilities locally. Development should provide the scale and mix of housing types that will meet the identified need for South Kesteven (as informed by the Local Housing Needs Assessment) and a range of new job opportunities in order to secure balanced communities (as informed by the Employment Land Study).”

The Local Plan Review in 6.12 states: *“The Larger Villages not only support their own communities but also fulfil the role of being a service centre to the smaller settlements and rural areas around them.”*

The Local Plan therefore sets out the context that to be a ‘larger village’ a settlement needs to be a service centre to a hinterland of smaller settlements around it and it needs to be a location that provides the necessary day-to-day services to ensure rural communities have choice in terms of homes, work and recreation. Claypole does not meet that definition and the simplistic approach to scoring does not explore the role that a settlement actually plays as the Local Plan Review actually requires.

The Local Plan Review settlement hierarchy is also inconsistent with the Sustainability Appraisal (SA). The SA Objective to ‘Reduce the contribution to climate change made by activities within South Kesteven’ includes the action to:

- Promote the use of sustainable modes of transport, including walking, cycling and public transport.

The SA Objective to ‘Promote sustainable transport use and encourage accessibility’ also includes the actions to:

- Reduce the number of journeys made and the need to travel
- Improve access to and quality of sustainable transport modes for all communities to encourage modal shift
- Improve accessibility to services, facilities and amenities

The SA Objective to ‘Support sustainable economic development in South Kesteven’ also includes the actions to:

- Improve accessibility to employment opportunities

The SA however fails to consider and assess the revised methodology and the changes to Policy SP2 against these SA objectives.

The local business category in the settlement hierarchy scoring matrix doesn’t reflect the presence or not of local employment opportunities or sites. Nowhere in the scoring matrix is the presence of a business park, office park or industrial estate given weighting. Such sites would provide a wide range of local employment opportunities that make a settlement generally more sustainable. The weighting applied to employment opportunities through the perceived number

of local businesses is unduly low. For example, a village would need to have 51-60 local businesses to score 6, which is the same score as a single local shop or a primary school. This significantly undervalues the role that employment plays in securing sustainable development and the sustainability of a settlement.

As a comparison Long Bennington scores 2 for local businesses, yet it has the very large Long Bennington Business Park that consists of some 8 detached two-storey buildings and a further new building nearing occupation that provides a further 475m² of employment floorspace in 5 units¹⁶. Adjacent to the business park is the very large HQ premises of ADR UK Tyremart which provides further local employment.

The nature of the scoring mechanism implies that Long Bennington is only twice as good as Claypole for business activity. This does not reflect the reality that Claypole has no employment sites such as business parks, office parks, depots or factories; whereas Long Bennington in contrast has significant local employment. In sustainability terms, Long Bennington provides significant opportunities for local employment whereas Claypole provides none.

Claypole is effectively a dormitory village, relying on the Newark Urban Area (and indeed beyond via Newark Northgate Station for example) for employment, shopping, entertainment and access to the public transport network.

As already highlighted Claypole was a 'small village' and the classification now as a 'larger village' implies that the self-sufficiency, accessibility, sustainability and role/function of the settlement must have changed for the positive. Whereas in fact there has been no change in local services and facilities or any of the above factors since the last 2019 scoring. The only change was in December 2018 which related to the café opening.

The score threshold has been set at 30, there is no explanation or rationale to underpin the selection of this figure. If it were to be increased or decreased then it would change the number of 'larger villages', particularly given the fact that two villages sit at 29 on current scoring just under the threshold.

The assessment criteria are not reflective of the factors set out in the Local Plan Review vision, Policy SP1 and paragraph 6.12. It does not properly assess all the factors relevant to the sustainability of a settlement.

There is no explanation as to why a primary school scores 6 points, double the score of a doctors and three times the score for a children's day nursery. Where primary schools are located is largely the consequence of decisions made in the Victorian period when most villages had a village school and past decisions to close certain schools; such decisions were generally based on factors such as costs of repairs or building sizes which had no relationship to the role and function of the settlement. There are eleven small villages in South Kesteven that have a Primary School, so 41% of the 27 village primary schools in South Kesteven are actually in the small villages. As such it is not a good indicator of the role of a settlement being a sustainable location for future growth or a settlement performing the role of a service centre.

In the same way there is no explanation as to why a food shop scores 6 points. Some 7 of the 24 food shops in South Kesteven are in the small villages. This is 29% of food shops being in the small villages, so again as such it is not a particularly good indicator of the role of a settlement being a sustainable location for future growth or a settlement performing the role of a service centre.

The scoring matrix counts School Bus services, this is slightly odd because legislation governing travel to school for children of compulsory school age applies, in particular:

¹⁶ Planning Permission S23/1528 and S22/2453

- section 508A of the Education Act 1996: sustainable travel to school;
- section 508B of and Schedule 35B to the Education Act 1996: travel arrangements for eligible children;
- section 508C of the Education Act 1996: travel arrangements for other children;
- the School Information (England) Regulations 2008: publication of information about travel arrangements.

As such in simple terms a child under the age of 8 is eligible for free travel to their nearest suitable school if it is more than 2 miles from their home; and a child aged 8 years or over is eligible for free travel to their nearest suitable school if it is more than 3 miles from their home. In this respect it is not really measuring any tangible measure.

Once again, the scoring for this criteria are actually inconsistent, as an example Colsterworth scores 0, saying that they do not have a school bus, but in fact they have service 183 Corby Glen - Great Casterton College bus service. Almost all services to/from mainstream schools are registered as normal bus services so they can be used by anyone and not just pupils although their routes and times relate to the school times.

As another example, Folkingham scores 0 for a school bus service, but it in fact has the Sleafordian S148S Aslackby - Sleaford bus service that runs on schooldays only. On that basis Folkingham should score 2 for a school bus service which would increase its total score to 31 making it suitable to be reclassified as a 'larger village' on the basis of score alone.

In the same way, Castle Bytham scores 0 for a school bus service, but it in fact has the Bland's S95S Stamford - Grantham bus service that runs on school days only. It also gets a mobile library service. Therefore, on that basis Castle Bytham should also score 2 for a school bus service and 1 for a mobile library which would increase its total score to 31 also making it suitable to be reclassified as a 'larger village' on the basis of score alone.

The methodology scoring also contains further errors relating to mobile library services, Colsterworth and Great Gonerby claim to have no mobile library but in fact the Lincolnshire County Council [website](#)¹⁷ shows that both of these settlements do in fact get a mobile library service, so both scores as larger villages should be increased by 1.

There are numerous examples that demonstrate the fundamentally flawed nature of the settlement hierarchy evidence base and the scoring inconsistencies. As such the entire process undertaken for the Local Plan Review is unsound and cannot withstand any level of scrutiny.

There is also no explanation as to why a local shop scores 6 points, double the score of a post office, double the score of a doctors, double the score of a secondary school or three times the score for a children's day nursery.

The methodology applied unduly weights provision of a local shop without any consideration as to the quality, size or range of goods on offer in that local shop. So, a small village corner shop type of shop scores the same as a convenience store mini supermarket type store, such as those run by the Lincolnshire Co-op. This is inappropriate because it is like comparing apples with pears. In a small village corner shop whilst you may be able to obtain basic provisions such as bread and milk, but you are unlikely to be able to do the weekly shop; which you could do in a Lincolnshire Co-op mini supermarket.

Long Bennington for example scores 6 points for retail infrastructure but has a large Lincolnshire Co-op mini supermarket measuring 3,450 square feet not including storage. That store includes the following¹⁸:

¹⁷ https://prism.librarymanagementcloud.co.uk/lincolnshire/assets/-/pages/mobile_libraries.html

¹⁸ As specified on the Lincolnshire Co-op website

- ATM (cash point)
- Car park
- Costa Express
- Disabled access
- Electric vehicle charging point
- Freshly Baked Bread (in store bakery)
- PayPoint
- Scratch cards
- Slushy Jacks
- Soft plastic recycling

That store is also open 07:00 to 22:00 Monday to Sunday, giving a total of 105 hours of opening per week.

In contrast, Claypole was allocated 9 points for local shops - this implies Claypole has double the amount of retail infrastructure than Long Bennington which is a non-sensical comparison. Claypole has a small convenience store of a village corner shop type of approximately 684 square feet shop space, and a small butcher of approximately 120 square feet shop space. These two stores do not provide a range of goods suitable to sustain a weekly shop for example.

Plus, the butchers in Claypole are only open 09:00 to 16:00 Tuesday to Friday and 09:00 to 13:00 on Saturday. This in retail terms is part-time opening, but the scoring mechanism does not set out any reduction in score for part-time opening for retail if it is an additional shop which lacks justification. The butchers' shop is only available on a Saturday morning for those who work traditional office hours. The scoring of 9 is based on the village store being scored at 6 as the first facility with the butchers as an additional facility scored at 3. But if the butchers were scored as a part-time first facility it would score 3 with the village store, then scoring 3 as the additional facility, resulting in a total score of 6 and not 9. The methodology does not explain what order facilities should be assessed in, but this can impact on the scores.

Claypole Village Store is open 07:00 to 20:00 Monday to Friday, 07:30 to 20:00 on Saturday and 08:00 to 17:00 on Sunday. Therefore, the opening hours in Claypole only total 86.5 hours which is 18% less than in Long Bennington at the Lincolnshire Co-op as a comparison.

In the broader retail sense Long Bennington has the Co-op mini-supermarket, post office service, hairdresser, 2 x pubs, bar/restaurant, fish & chips takeaway, café, takeaway/lounge, gift/home/garden shop, pet/animal feed store and car dealer/garage. Whereas Claypole has the village store, butchers, hairdressers, café and pub; much less than Long Bennington which the way the scoring mechanism works, doesn't fully reflect.

In the scoring matrix only 5 villages out of 16 'larger villages' have a score of 9 or 12 for local shops. As a comparison Ancaster scores 9 but has a Co-op Food mini-supermarket (open 06:00 - 23:00 daily), a second convenience store (Premier) and a butchers. Claypole is being assessed as having the same local shop provision as Ancaster which is in fact not the case. Ancaster should score 12 for local shops, another example of inaccuracy in the scoring matrix.

The settlement hierarchy methodology should be fundamentally reworked based on a new evidence base. It should correlate to the role and function that a settlement provides as a service centre as the vision, Policy SP1 and paragraph 6.12 of the Local Plan Review envisages. More emphasis should be placed on the availability of high frequency scheduled public transport that allows residents to readily and effectively access employment and higher order services and facilities in nearby towns; together with the ability for residents to effectively access health services.

Effective public transport needs to include services suitable for commuting including early mornings and early evenings; where evening and Sunday services are available this should score

even more highly. Claypole scores very poorly in terms of public transport provision, this considerably undermines the sustainability of the village.

The settlement hierarchy methodology also needs to reduce the undue weight given to local shops and primary schools and include a differential based on the difference in size and opening hours of local shops, in order that mini supermarket type stores are properly differentiated from a village corner shop type store.

The methodology should also include a new focus on the provision of local employment, in particular the availability of business parks, office parks, industrial estates, depots and purpose-built work premises that provide local employment. In this way the settlement hierarchy would reflect the three strands of sustainable development in paragraph 8 of the NPPF.

If the settlement hierarchy were to include a full, accurate and objective analysis of these factors then Claypole would not fulfil the role and function of a 'larger village' as the Local Plan Review envisages, and it would properly remain classified as a 'small village'.

Geographical Position

Claypole is geographically isolated from the rest of South Kesteven, it sits in somewhat of an 'spatial island' surrounded on three sides by the River Witham and the East Coast Mainline. There are only 3 connecting roads into and out of Claypole. These are Shire Lane to the west towards the Newark Urban Area across the river bridge. The other roads are Stubton Road to the east towards Stubton across the level crossing, and Doddington Lane to the south towards Dry Doddington.

All three roads have constraints, the road at Claypole bridge is below the flood risk level so is at risk of becoming impassible due to fluvial flooding. The East Coast Mainline level crossing is on a stretch of line with a line speed of 125mph and is used by 229 trains per day¹⁹. For that number of trains, at just a 2-minute closure per train would mean that the level crossing would be closed for over 7.5 hours per day which poses a significant constraint and opportunities for delay entering or leaving Claypole.

The level crossing is recorded as having an Individual risk rating of F and a collective risk rating of 4 (High)²⁰. As such it is a level crossing that poses a significant risk. There were proposals around 10 years ago by Network Rail to close this level crossing as part of a wider programme around Newark that was not progressed.

Doddington Lane is a single file road with passing places for some of its length and without passing places for other sections. It therefore provides poor connectivity between Dry Doddington and Claypole. Given these constraints, residents of the neighbouring villages of Stubton and Dry Doddington are more likely to look to Caythorpe and Long Bennington respectively when they are looking to access services and facilities such as a shop.

The relative geographical isolation of Claypole from the remainder of South Kesteven should also be factored into the assessment of the settlement hierarchy. This would be alongside the geographical and functional inter-relationship to the Newark Urban Area.

¹⁹ Network Rail data

²⁰ Individual Risk Rating is the risk to individual users of the crossing. It is presented as a single letter, with A being the highest risk and M being the lowest. Collective Risk Rating is the overall risk of any incident involving any person or vehicle on the crossing, including train staff and passengers as well as users of the crossing. It is presented as a number, with 1 being the highest risk and 13 being the lowest. This is the most important rating when prioritising safety measures at level crossings.

Sustainability Appraisal Addendum

The Sustainability Appraisal Addendum for the Draft Local Plan is considered to be fundamentally flawed as it has failed to consider the reasonable alternatives for meeting the housing supply; namely it has failed to consider the alternative of delivering housing through a new settlement.

It is noted that site SKPR-278 (GR3-H1): Spitalgate Heath - Garden Village (Mixed Use Allocation) has indicative unit numbers of 3,700 houses (1,512 anticipated to be constructed by 2043). There has been no consideration however as to whether the proposed new allocations for the Larger Villages which totals 2,421 dwellings could more appropriately be provided in a new settlement, with newly planned infrastructure.

The optimum size for a garden village, according to the UK government, is generally between 1,500 and 10,000 homes. This size range allows for a balance between creating a distinct, self-contained community with its own facilities and infrastructure, while also being smaller than a new garden town which typically has over 10,000 homes. The level of growth for South Kesteven is of a level where a reasonable alternative that needs to be considered is a new settlement.

The SA Addendum in paragraph 5.28 states:

“It is recognised that the sites may also contain non-designated heritage assets and features which could also be impacted by development. In this respect, the Historic Environment Record (HER) will be reviewed within the SA Report accompanying the Regulation 19 version of the Local Plan to determine the potential impacts to non-designated heritage assets and features.”

The SA undertaken is therefore incomplete as the SA addendum acknowledges. It is inappropriate to make decisions on site selection in the absence of properly assessing all factors through a robust Sustainability Appraisal.

The SA Addendum in the Climate Change section is completely silent on the consideration of flood risk from all sources, including surface water flood risk. In this respect the SA Addendum is fundamentally flawed.

Anthony Northcote *HNCert LA(P), Dip TP, PgDip URP, MA, FGS, MIOl, MCMI, MRTPI*
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